FINAL

ENVIRONMENTAL ASSESSMENT

PROPOSED ACQUISITION OF LAND FOR THE CONSTRUCTION AND OPERATION OF SURFACE PARKING LOTS

AND

PROPOSED MODIFICATION OF KIRMAN AVENUE

FOR THE

VA SIERRA NEVADA HEALTHCARE SYSTEM

975 KIRMAN AVENUE

RENO, WASHOE COUNTY, NEVADA

DEPARTMENT OF VETERANS AFFAIRS

425 I STREET, NW

WASHINGTON, DC 20001

PREPARED BY:

TTL Associates, Inc.

FEBRUARY 4, 2016

ENVIRONMENTAL ASSESSMENT
ABSTRACT

LEAD AGENCY:	Department of Veterans Affairs (VA)
COOPERATING AGENCIES:	None
TITLE OF PROPOSED ACTION:	Proposed Acquisition of Land for the Construction and Operation of Surface Parking Lots and Proposed Modification of Kirman Avenue for the VA Sierra Nevada Healthcare System
AFFECTED JURISDICTION:	Reno, Washoe County, Nevada
POINT OF CONTACT:	Ms. Almaira Garcia, VA Project Manager, Real Property Service, 425 I Street, NW, Room 6W21A, Washington DC 20001; Email: Almaira.Garcia@va.gov; Tel.: (202) 632-5176
PROPONENTS:	Department of Veterans Affairs (VA)

DOCUMENT DESIGNATION: Environmental Assessment (EA)

ABSTRACT: This Environmental Assessment (EA) evaluates the Proposed Action of VA to acquire land adjoining the VA Sierra Nevada Healthcare System (VASNHCS) campus located at 975 Kirman Avenue in Reno, Washoe County, Nevada for the construction and operation of surface parking lots for the facility. The Proposed Action also includes the modification of Kirman Avenue between the eastern and western portions of the VASNHCS campus to provide improved safety for patients and staff crossing from the parking facilities east of Kirman Avenue to the medical center buildings west of Kirman Avenue. This EA discusses two alternatives: (1) *Preferred Action Alternative* - the acquisition of up to 11 parcels of residential land (totaling approximately two acres) adjoining to the north and east of the VASNHCS campus across East Taylor Street, Kirman Avenue and Belli Drive for the construction and operation of surface-level parking lots (would provide up to 200 additional parking spaces) and the reduction of Kirman Avenue to one lane between the eastern and western portions of the VASNHCS campus; and (2) the *No Action Alternative*. The EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; and environmental justice. The EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementing the Preferred Action Alternative, provided general best management practices (BMPs), management measures, and mitigation measures specified in this EA are implemented. Therefore, this EA concludes that a mitigated Finding of No Significant Impact (FONSI) is appropriate, and that an Environmental Impact Statement (EIS) is not required.

EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs (VA's) proposed acquisition of land adjoining the VA Sierra Nevada Healthcare System (VASNHCS) campus located at 975 Kirman Avenue, Reno, Washoe County, Nevada for the construction and operation of surface parking lots and the proposed modification of the section of Kirman Avenue that bisects the VASNHCS campus. Preparation of this EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq*.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). This EA has also been prepared in accordance with *VA NEPA Interim Guidance for Projects* dated 30 September 2010.

Proposed Action

VA's Proposed Action is to acquire land adjoining the VASNHCS campus and, due to a shortage of on-campus parking, construct and operate surface parking lots. These new parking lots would be used by VASNHCS staff, Veteran patients, and visitors who currently park on the streets surrounding the VASNHCS. The parking lots may also be used by contractors during planned construction projects at the VASNHCS.

VA may consider the development of other VASNHCS-related uses on the acquired parcels in the future; however, these potential other uses are not defined at this time and are not included in this Proposed Action. If other VASNHCS-related uses are planned in the future, they would be addressed in a future supplemental NEPA analysis, as applicable, prior to development.

VA's Proposed Action also includes the modification of the section of Kirman Avenue that bisects the VASNHCS campus. Primary parking at the campus is located east of Kirman Avenue and the medical center buildings are located west of Kirman Avenue. VA's proposed modification would provide improved safety for patients and staff crossing Kirman Avenue between the eastern and western portions of the campus.

Purpose and Need

The ***purpose*** of the Proposed Action is to provide additional parking capacity in the vicinity of the VASNHCS campus that would help alleviate the current and future projected parking space deficits at the VASNHCS and to improve the safety of VASNHCS patients and staff crossing Kirman Avenue between the eastern and western portions of the campus. The Proposed Action would provide additional surface level parking to help meet the unmet parking needs of Veterans seeking healthcare services at the VASNHCS and medical center staff. The proposed parking lots would also help meet the parking needs of contractors during planned campus construction activities. The Proposed Action would also modify Kirman Avenue to increase safety for patients, staff, and visitors who cross Kirman Avenue from the primary parking areas to the primary hospital facilities.

This Proposed Action is ***needed*** to help address the current and projected long-term parking deficiency at the VASNHCS campus and to address pedestrian safety issues for patients, staff, and visitors that are required to cross Kirman Avenue between the eastern and western portions of the campus.

The VASNHCS is land locked on an approximately 12.5-acre campus, which currently supports over 540,000 square feet of patient care, related structures, a two-story parking garage and seven small parking lots. The VASNHCS campus is currently divided into east and west portions by Kirman Avenue with the majority of medical care operations to the west of Kirman Avenue and the majority of support functions and on-campus parking to the east of Kirman Avenue.

From Fiscal Year (FY) 2007 to FY 2014, the number of patients receiving healthcare services at the VASNHCS grew from 25,000 per year to over 35,000 per year (an increase of over 40 percent) and the number of outpatient visits increased from 244,000 per year to 420,000 per year (over 70 percent increase). VA anticipates that Reno area Veterans need for healthcare services and, consequently, VASNHCS's workload will continue to grow in the future.

The VASNHCS campus currently includes approximately 578 VA-owned, on-campus parking spaces provided by the parking garage on the eastern portion of the campus and seven small surface parking lots. A parking demand analysis conducted by VA found that the facility is currently operating under an approximately 580 parking space deficit that is projected to increase for the foreseeable future. The VASNHCS currently relies on street parking in the residential neighborhoods surrounding the campus to overcome the on-campus parking deficiency. This has resulted in overutilization of the residential street parking, traffic congestion, and pedestrian hazards. Planned future VASNHCS projects include the construction of an additional parking structure on the eastern portion of the campus; however, the structure would not fully address the parking deficiency. In addition, the proposed construction activities would temporarily eliminate some existing on-campus parking, which would exacerbate the parking shortfall.

The Proposed Action would provide additional land for the creation of new VA-owned parking, which would partially eliminate the long-term VASNHCS parking deficit and would reduce the parking impacts associated with the planned campus construction activities.

Kirman Avenue is a southbound, two-lane, one-way road with parallel parking on both sides of the street. During each weekday, approximately 3,400 vehicles use the segment of Kirman Avenue that separates the eastern and western portions of the VASNHCS campus. The main curbside drop-off area for the medical center is located along the western side of Kirman Avenue within this segment. Primary parking for the medical center is provided by the parking garage and surface lots located east of Kirman Avenue, requiring patients and staff to cross Kirman Avenue. VA, in conjunction with the City of Reno, has installed a mid-block crosswalk with a flashing beacon to provide safe passage between the parking area and the medical center. However, this section of Kirman Avenue is congested and dangerous to cross, especially for medical center patients, who by their nature, walk more slowly.

The proposed modification of the section of Kirman Avenue that bisects the campus would moderate and control the flow of traffic in this area to improve pedestrian safety.

Alternatives

After identifying the need for additional on-campus parking to accommodate the needs of VASNHCS patients and staff, VA examined the existing campus for the creation of additional on-site parking. The campus is fully developed and space for additional construction is limited. VA considered the construction of a new parking garage in one or more of the existing on-campus parking lots; however, these lots were found to be too small to support an adequately sized structure. In addition, the construction of a parking garage in these areas would limit future planned construction projects at the campus. VA also considered the construction of additional levels on the existing parking structure. However, the existing parking garage is nearing the end of its design life and is not structurally suitable for the construction of additional levels. VA considered demolishing the existing parking structure and replacing it with a new, larger structure. While this would provide additional needed parking capacity, it would result in the temporary loss of approximately 330 parking spaces provided by the current structure during construction, which would greatly exacerbate the current parking shortage. Therefore, this alternative was eliminated. VA also considered the demolition and/or relocation of some of the smaller structures in the southeastern portion of the campus for the construction of a new parking structure. However, this alternative would temporarily eliminate approximately 70 existing parking spaces during construction, which would exacerbate the current parking shortage. Therefore, this alternative was eliminated from further consideration for this Proposed Action. However, VA plans to construct a new parking garage in this area in the future, once the new proposed surface parking lots are established. The new parking garage would be needed because the proposed new parking lots would provide a maximum of 200 new parking spaces, which would not fully address the parking shortage (580 parking spaces).

VA previously leased and operated an off-campus satellite parking lot at Park Lane Mall in an attempt to partially address the on-campus parking deficiency. However, patients and staff elected to park on streets in the vicinity of the campus and walk to their appointments or work in lieu of parking at the satellite parking lot and using the VA-provided free shuttle service to and from the campus. Based on this past experience, VA eliminated off-campus satellite parking options to address the parking shortage.

Through this analysis, VA determined that the acquisition of additional land adjoining the VASNHCS campus for the development of surface parking lots best met its needs for additional VA-owned, on-site parking.

VA initially considered the complete closure of the section of Kirman Avenue that bisects the campus as the most desirable solution to address pedestrian street-crossing safety hazards. This option would have eliminated the need to cross Kirman Avenue and would have improved the continuity of the campus, providing VA increased options for possible future campus development and reconfiguration. Building an elevated walkway with stairs over Kirman Avenue was not considered feasible due to the physical limitations of many Veteran patients. In addition, Federal standards do not permit the construction of pedestrian skywalks over public roads due to new security standards. VA also approached the City of Reno with a request to install a pedestrian traffic signal to permit safe crossing between the eastern and western portion of the campus; however, the City of Reno responded that national traffic and pedestrian traffic standards do not justify the installation of a pedestrian traffic signal.

VA approached the City of Reno and local resident groups regarding the possible closure of this portion of Kirman Avenue. The local resident groups expressed concern that the complete

closure of this section of Kirman Avenue would worsen already strained traffic conditions in the VASNHCS area and requested that VA consider other options to improve pedestrian safety. Through additional evaluation and meetings with the City of Reno and local resident groups, VA found that modification of Kirman Avenue to moderate and control traffic flow adjacent to the campus, yet maintaining the flow of through traffic on one lane, would improve pedestrian safety and was supported by area residents and the City of Reno.

This EA examines in-depth two alternatives, the Preferred Action Alternative and the No Action Alternative, defined as follows:

Preferred Action Alternative - VA's Preferred Action Alternative is to acquire up to 11 parcels of residential land (approximately two acres) adjoining to the north and east of the existing VASNHCS campus across East Taylor Street, Kirman Avenue, and Belli Drive for the construction and operation of surface-level parking lots and the reduction of Kirman Avenue to one lane between the eastern and western portions of the VASNHCS campus.

The 11 parcels identified for possible acquisition include the following:

- **691/693 East Taylor Street** – one duplex residence and associated garage.
- **697/699 East Taylor Street** – one duplex residence.
- **825/835 Kirman Avenue** – one duplex residence and associated garage.
- **700 – 710 East Taylor Street** – one duplex residence.
- **701 – 735 Belli Drive** – one triplex residence with an associated garage and one small apartment building with an associated garage.
- **765 – 807 Belli Drive** – one small apartment building with an associated garage, one duplex residence, and one garage with apartments.
- **825 – 831 Belli Drive** – one quadplex residence.
- **845 Belli Drive** – one small apartment building.
- **865 Belli Drive** – one small apartment building.
- **885 Belli Drive** – one single-family residence.
- **703 Balzar Circle** – one single-family residence.

VA would seek to purchase the 11 parcels of land from willing landowners through negotiation. Several of the property owners have expressed interest in selling their land to VA. VA would negotiate to acquire as many of the parcels as voluntarily available and would base the parking lot design on the land acquired. VA estimates that if all 11 parcels were to be acquired, up to 200 parking spaces would be constructed on the acquired land. The land and parking lots would be owned and maintained by VA as part of an expanded VASNHCS campus.

The section of Kirman Avenue between the eastern and western portions of the VASNHCS campus would be modified to moderate and control the flow of traffic adjacent to the campus to improve the safety of VASNHCS Veteran patients, staff, and visitors crossing this section of road. Modifications would include the reduction of the two southbound lanes on this one-way section of road to one southbound lane. The roadway modifications would be designed in coordination with the City of Reno.

The Preferred Action Alternative effectively provides the best combination of adjacent land and close proximity to increase VASNHCS parking and improve pedestrian safety. The Preferred Action Alternative would reduce VA's current and projected parking deficiencies, would reduce VA's reliance on street parking in the adjacent residential neighborhoods, and would improve the safety of VASNHCS patients, staff, and visitors who cross from campus parking facilities east of Kirman Avenue to the medical center buildings west of Kirman Avenue.

No Action Alternative - Under the No Action Alternative, the Proposed Action would not be implemented and operations at the VASNHCS campus would continue as currently conducted. Parking at the VASNHCS campus would continue to be deficient. VA would continue to rely on over utilized street parking in the residential neighborhoods surrounding the VASNHCS to overcome the on-campus parking deficiency, and associated traffic congestion and pedestrian hazards would persist. The proposed acquisition parcels would likely continue in their current residential use. In addition, the section of Kirman Avenue that bisects the campus would not be modified and would remain dangerous to cross for VASNHCS patients, staff and visitors.

The No Action Alternative would not reduce the parking deficiency at the VASNHCS, would not enable VA to provide adequate parking to U.S. Veterans and VASNHCS staff, and would not improve pedestrian safety. However, the No Action Alternative is assessed in this EA to provide a comparative baseline analysis, as required under the CEQ Regulations.

Affected Environment and Environmental Consequences

The affected environment of the Preferred Action Alternative and its immediate surroundings, or the Region of Influence (ROI) of the Proposed Action, is discussed in Section 3 of this EA.

Both considered alternatives, the Preferred Action Alternative and the No Action Alternative, are evaluated in this EA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action's ROI. Technical areas evaluated in this EA include:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

Preferred Action Alternative - The Preferred Action Alternative would result in the impacts identified throughout Section 3. These include potential significant adverse impacts to cultural resources and transportation, and less-than-significant adverse impacts to aesthetics, air quality, soils and geology, hydrology and water quality, noise, land use, socioeconomics, solid and hazardous materials, parking, utilities, and environmental justice. With the exception of potential cultural resources and transportation impacts, all of these impacts are less-than-significant and would be further reduced through careful implementation of the general Best Management Practices (BMPs) and management measures, and compliance with regulatory requirements as identified throughout Section 3 and summarized in Section 5.

The Preferred Action Alternative could result in significant adverse effects on cultural resources. Residential structures on six of the eleven parcels proposed for acquisition (700-710 East Taylor Street, 701-735 Belli Drive, 765-807 Belli Drive, 845 Belli Drive, 865 Belli Drive, and 885 Belli Drive) contribute to the National Register of Historic Places (NRHP)-eligible Belli Addition Historic District. The demolition of the homes on these parcels would result in an adverse effect to the historic district by diminishing the number of contributing properties in the district, by altering its southern boundary along Belli Drive, and by eliminating the only multi-story brick multi-unit apartment buildings in the district. In consultation with Nevada State Historic Preservation Office (SHPO), VA would develop a plan to mitigate cultural resource effects associated with the Preferred Action Alternative. The mitigation measures would be formalized in a Memorandum of Agreement (MOA) between VA and SHPO and other interested parties. Compliance with the terms of the MOA would satisfy VA's requirements under Section 106 of the National Historic Preservation Act (NHPA) and would mitigate the adverse effects to cultural resources of the Preferred Action Alternative to acceptable, less-than-significant levels.

The Preferred Action Alternative could also result in significant adverse effects on transportation. The reduction of Kirman Avenue from two southbound lanes to one southbound lane would allow the continued flow of through traffic and is anticipated to result in less traffic impacts than the complete closure of the road. However, the roadway reduction would impact traffic flow in the area of the VASNHCS campus. VA would conduct a traffic impact analysis to evaluate the potential effects of the proposed Kirman Avenue modifications and would work with the City of Reno to design and implement improvements that would mitigate any identified significant adverse effects to acceptable, less-than-significant levels.

No adverse effects to wetlands, floodplains, coastal zones, or community services would be anticipated.

The Preferred Action Alternative would result in significant long-term positive effects to parking conditions at the VASNHCS and on the neighboring streets and to pedestrian safety. The Preferred Action Alternative could also result in potential positive impacts to socioeconomics and environmental justice, and long-term positive impacts to solid and hazardous materials. No health or safety risks to children are anticipated. Safety conditions would improve by reducing street parking and calming traffic on Kirman Avenue.

The EA also examines the potential cumulative effects of implementing the Proposed Action. This analysis finds that implementation of the Preferred Action Alternative with the general BMPs, management measures, and mitigation measures specified in this EA would not result in significant adverse cumulative impacts to onsite or regional natural or cultural resources, and would maintain or enhance the socioeconomic environment of the area through long-term

provision of additional parking and safe access necessary for Veterans seeking healthcare services at the VASNHCS.

No Action Alternative - Under the No Action Alternative, the Proposed Action would not be implemented and no short-term or long-term improvements to parking conditions at the VASNHCS or the safety of VASNHCS patients, staff and visitors crossing Kirman Avenue between the eastern and western portions of the campus would occur. VA's ability to provide sufficient parking to Veterans seeking healthcare services at the VASNHCS and safe access to the medical facilities at the campus would be compromised.

Agency and Public Involvement

Agencies consulted for this EA include: US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Army Corps of Engineers (USACE); Nevada Division of Environmental Protection (NDEP); Nevada Department of Conservation and Natural Resources (NCDNR); Nevada, State Historic Preservation Office (SHPO); Nevada Department of Transportation (NDOT), United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Reno Economic Community Development Department (RECDD), Reno Economic Development and Redevelopment Department (REDRD), Reno Department of Public Works (RDPW), and Regional Transportation Commission of Washoe County (RTC). Agency information and comments have been incorporated into this EA. Copies of relevant correspondence can be found in Appendix A.

The following summarizes information provided by the agencies consulted:

- The **US Fish and Wildlife Service (USFWS), Reno Fish and Wildlife Office (RFWO)** noted that information pertaining to threatened, endangered, and candidate species and critical habitat can be obtained from the USFWS Information, Planning, and Conservation (IPaC) System internet website. According to the USFWS IPaC System, Endangered Species Program database, one Federally-listed endangered fish species, one Federally-listed endangered plant species, and one Federally-listed endangered insect species are known to occur within Washoe County, Nevada. Two Federally-listed threatened fish species and one Federally-listed threatened plant species are also known to occur within Washoe County. In addition, two Federally-listed candidate plant species and one Federally-listed candidate bird species are known to occur within Washoe County. Based on the lack of natural habitat in the VASNHCS campus area, none of the identified species are likely to be present.

- The **Nevada Department of Conservation and Natural Resources (NDCNR), Natural Heritage Program (NHP)** stated that there are no recorded "at risk" species in the vicinity of the VASNHCS campus. However, the NDCNR NHP stated that there is potential habitat for the Tricolored Blackbird, a species classified as Critically Imperiled, and the Spotted Bat, a species classified as a Nevada Bureau of Land Management Sensitive Species. The NDCNR recommended that VA consult with the Nevada Department of Wildlife (NDOW) for additional information.

  According to the NDOW internet website, Tricolored Blackbird habitats include annual grasslands, wet and dry vernal pools, and other seasonal wetlands. Spotted Bat habitats include wetlands, riparian, rock, cliff, desert, shrubland, grassland, or woodland areas

usually near a permanent water source. They roost in caves and rock crevices mainly, but may also occasionally use mines, caves, and buildings as roost sites. Based on the habitat requirements for these species and the developed nature of the VASNHCS campus and surrounding area, it is unlikely that these species are present.

- The **Nevada Division of Environmental Protection (NDEP), Bureau of Waste Management (BWM)** did not identify any Resource Conservation and Recovery Act (RCRA) permits or files for the proposed acquisition parcels.

- According to the **NDEP, Bureau of Air Pollution Control (BAPC),** the responsibility of maintaining air quality in the City of Reno has been delegated by the NDEP to the Washoe County Air Quality Management Division (AQMD).

- The **NDEP, Bureau of Corrective Actions (BCA)** provided a link to corrective action and leaking underground storage tank (UST) listings. One of the proposed acquisition parcels (805 Belli Drive) was identified as a location of a heating oil UST release. Additional information provided by BCA for this property indicates that one 550-gallon heating oil UST and approximately 31 tons of impacted soil were removed from this property in November 2011. Minor residual impacted soil remained following the excavation activities, but could not be removed without undermining the street and sidewalk. In January 2012, NDEP determined that no additional corrective action was necessary.

- The **Regional Transportation Commission of Washoe County (RTC)** noted that Kirman Avenue is a regional road with a functional class designation of collector and an access management designation of Low Access Control. RTC noted that this road is included in the RTC travel demand model and should the road be abandoned (which was being considered by VA at the time), the regional transportation plan and travel demand model would need to be updated to reflect the change. The RTC indicated that it has a bus transit line (Route 13) that serves this area and uses Kirman Avenue. RTC noted that should the roadway be abandoned, the portion of Route 13 that serves the neighborhoods south of the VASNHCS would need to be picked up by a new route or the current route would need to be altered. RTC stated that the abandonment of Kirman Avenue (no longer considered by VA) would have clear impacts to transit, but RTC believed that those impacts could be mitigated as long as VA is required to maintain current transit access or create new and better access to the facility. RTC also noted some concern on the effect to the pedestrian flow along Kirman Avenue, especially with access to the Veterans Elementary School in the area.

Several Federally-recognized Native American Tribes were identified as having possible ancestral ties to the VASNHCS region. In addition, SHPO identified two Nevada organizations, Preserve Nevada and Nevada Architectural History Alliance, and requested that VA include these organizations in their consultation. These tribes and organizations were contacted by VA for input regarding the Proposed Action. As of the date of this EA, no responses have been received from the tribes (VA 2015).

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in the *Reno Gazette-Journal*, on November 21- 23, 2015. The Draft EA was also made available for public review at the VASNHCS and the Washoe County Library. In addition, VA held a public meeting at VASNHCS on December 17, 2015 to briefly summarize the Draft EA and receive public comment. Twenty-one people, mostly residents or property owners of the area near the VASNHCS, signed in as attendees at the

public meeting. Twelve people provided verbal comments during the meeting. Three people provided written comments via email or on the comment sheet after the meeting. Several of the commenters provided similar comments and many provided multiple comments. Comments included the suggestion of other alternatives to address the parking deficit and pedestrian safety issues at the VASNHCS campus, concern about potential traffic impacts associated with the Preferred Action Alternative, concern that VA would obtain parcels through eminent domain and would close Kirman Avenue entirely (neither is planned), and concern about the economic and aesthetic impacts of the Preferred Action Alternative on the surrounding residential properties.

The comments that are relevant to the Draft EA and VA's responses are summarized in Appendix D. Where applicable, the Final EA was modified to reflect these comments.

Conclusions

The analysis performed in this EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementation of the Preferred Action Alternative, provided general BMPs, management measures, and mitigation measures specified in this EA are implemented. This EA's analysis determines, therefore, that an Environmental Impact Statement (EIS) is unnecessary for implementation of the Proposed Action, and that a FONSI is appropriate.

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SECTION 1: INTRODUCTION

1.1 Introduction

This Section provides the reader with necessary introductory and background information concerning the Proposed Action for proper analytical context and identifies the purpose of and need for the Proposed Action and the Federal decision to be made. A summary of public/agency involvement is provided in Section 4. Federal, State, and local regulations applicable to the Proposed Action are identified in Section 11.

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs (VA), a Federal agency, proposed acquisition of land adjoining to the VA Sierra Nevada Healthcare System (VASNHCS) campus located at 975 Kirman Avenue, Reno, Washoe County, Nevada for the construction and operation of surface parking lots and the proposed modification of the section of Kirman Avenue that bisects the VASNHCS campus to improve pedestrian safety (Proposed Action). The VASNHCS is located at 975 Kirman Avenue in Reno, Washoe County, Nevada. Figures 1 through 5 depict the location and features of the VASNHCS campus.

Preparation of this EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq*.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). This EA has been prepared in accordance with VA's *NEPA Interim Guidance for Projects* (2010).

In accordance with the above regulations, this EA: allows for public input into the Federal decision-making process; provides Federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; identifies measures the Federal decision-maker could implement to reduce potential environmental effects; and documents the NEPA process.

This EA examines in-depth two alternatives: the Preferred Action Alternative and the No Action Alternative, defined as follows:

- **Preferred Action Alternative**: Acquire up to 11 parcels of residential land (approximately two acres) adjoining to the north and east of the existing VASNHCS campus across East Taylor Street, Kirman Avenue, and Belli Drive, for the construction and operation of surface-level parking lots and the reduction of Kirman Avenue to one lane between the eastern and western portions of the VASNHCS campus.

- **No Action Alternative**: Do not implement the Proposed Action as identified and continue with operations as currently conducted at the VASNHCS.

1.2 Background

The VASNHCS provides primary and secondary care to a large geographic area that includes 21 counties in northern Nevada and northeastern California. In addition, VA offers regional medical care in four Outpatient Clinics located in Minden and Fallon, Nevada and Auburn and Susanville, California. Additionally, VASNHCS operates a Rural Outreach Clinic in Winnemucca, Nevada, provides offsite primary care services at the VASNHCS East Campus at 1201 Corporate Boulevard, and also operates a Homeless Clinic at 250 Capital Hill Avenue and an Eye Clinic at 2295 Kietzke Lane all in Reno, Nevada.

Prior to the late 1930s, the land that the VASNHCS campus currently occupies was unimproved. The construction of Building 1A, located in the central portion of the VASNHCS campus and west of Kirman Avenue, was approved in 1935 and the VA hospital opened in 1939. The area east of Kirman Avenue remained unimproved land until the late 1970s. The VASNHCS campus was expanded from the late 1970s through the early 1980s, including the construction of the current Community Living Center, Dining and Canteen, and Clinical buildings west of Kirman Avenue; and the current Boiler Plant and Laundry buildings, and surface-level parking east of Kirman Avenue. An additional expansion of the VASNHCS campus occurred in the late 1990s with the addition of the Bed Tower, ED Wing, and MRI Wing buildings west of Kirman Avenue; and the Maintenance and Research buildings east of Kirman Avenue.

The VASNHCS campus is land locked on an approximately 12.5-acre area, which currently supports over 540,000 square feet of patient care, related structures, a two-story parking garage, and seven small parking lots. The VASNHCS campus is currently divided into east and west portions by Kirman Avenue with the majority of medical care operations located west of Kirman Avenue and the majority of support functions and parking located east of Kirman Avenue (Refer to Figures 1 through 5).

In excess of 120,000 Veterans reside within the VASNHCS region, with the City of Reno representing the largest urban area. The VASNHCS campus is the site of the Loannis A. Lougaris VA Medical Center (VAMC), which operates 56 hospital beds and 60 Transitional Care Unit beds. During Fiscal Year (FY) 2014, VASNHCS provided care to over 35,000 individual patients, which accounted for approximately 420,000 outpatient visits and more than 3,000 inpatients. These numbers represent a dramatic increase since FY 2007, at which time the facility was treating 25,000 individual patients, which resulted in 244,000 outpatient visits and 2,800 inpatients.

Over the past several years, VA has made a strong national commitment to providing high quality, accessible healthcare to all former members of the nation's military because of the service they provided to the country. This commitment has resulted in the dramatic increase in VASNHCS workload, budget and staffing. VA projections indicate additional increases in workload for VASNHCS in the future, particularly in outpatient services. It is in consideration of the additional workload projections and the estimated increase in population in the Reno, Nevada area (estimates show a projected population growth in Washoe County of 30 percent between 2014 and 2033) that VA is in the process addressing long term VASNHCS facility needs.

Starting in 2010, VA began a multi-year effort to reconfigure the VASNHCS campus to provide for additional and more efficient medical care to Veterans. Specifically, VA is in the process of

planning or designing projects that would correct existing shortcomings or increase the capacity of the facility to provide the following services:

- Primary and Specialty Care Services
- Dental Services
- Diagnostic Imaging Services
- Same Day (Outpatient) Surgical Services
- Intensive Care Unit
- Community Living Center
- Eye Clinic Services
- Audiology Services
- On-campus Parking

In addition to positioning the facility to address the projected increases in the above listed areas, VA is planning improvements to the VASNHCS campus as a whole to allow enhanced access to the site for all patients and staff, along with improvements to the surrounding neighborhood. These campus improvements would vastly enrich the experience of all patients who come to the facility for healthcare services, while simultaneously enriching the residents in the community immediately surrounding the facility.

FIGURE 1

REGIONAL LOCATION MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS PARKING LOTS AND
KIRMAN AVENUE MODIFICATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO.
12181.02

TTL associates inc
Environmental, Geotechnical Engineering & Testing

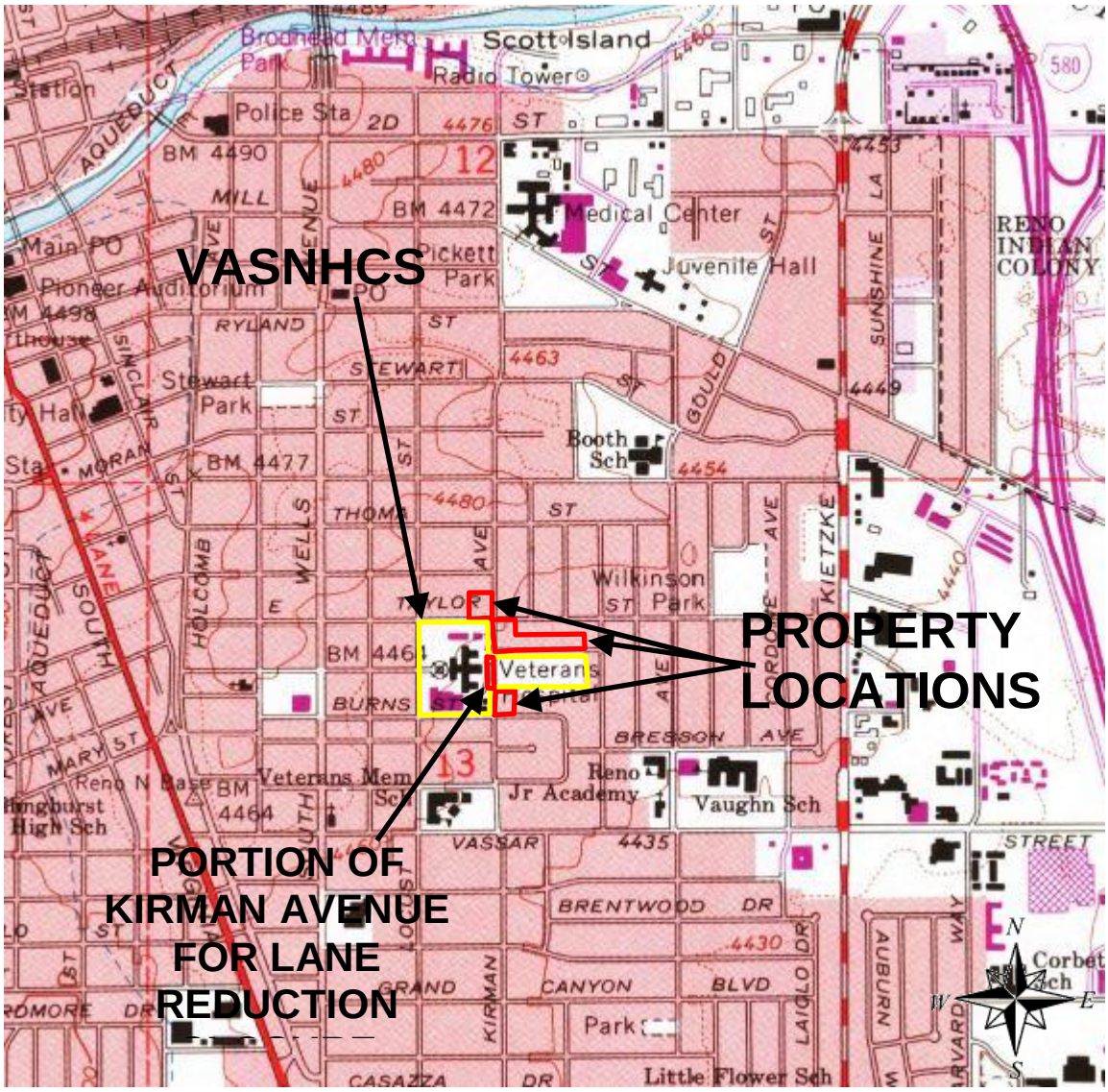

FIGURE 2

VICINITY TOPOGRAPHIC MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS PARKING LOTS AND
KIRMAN AVENUE MODIFICATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO.
12181.02

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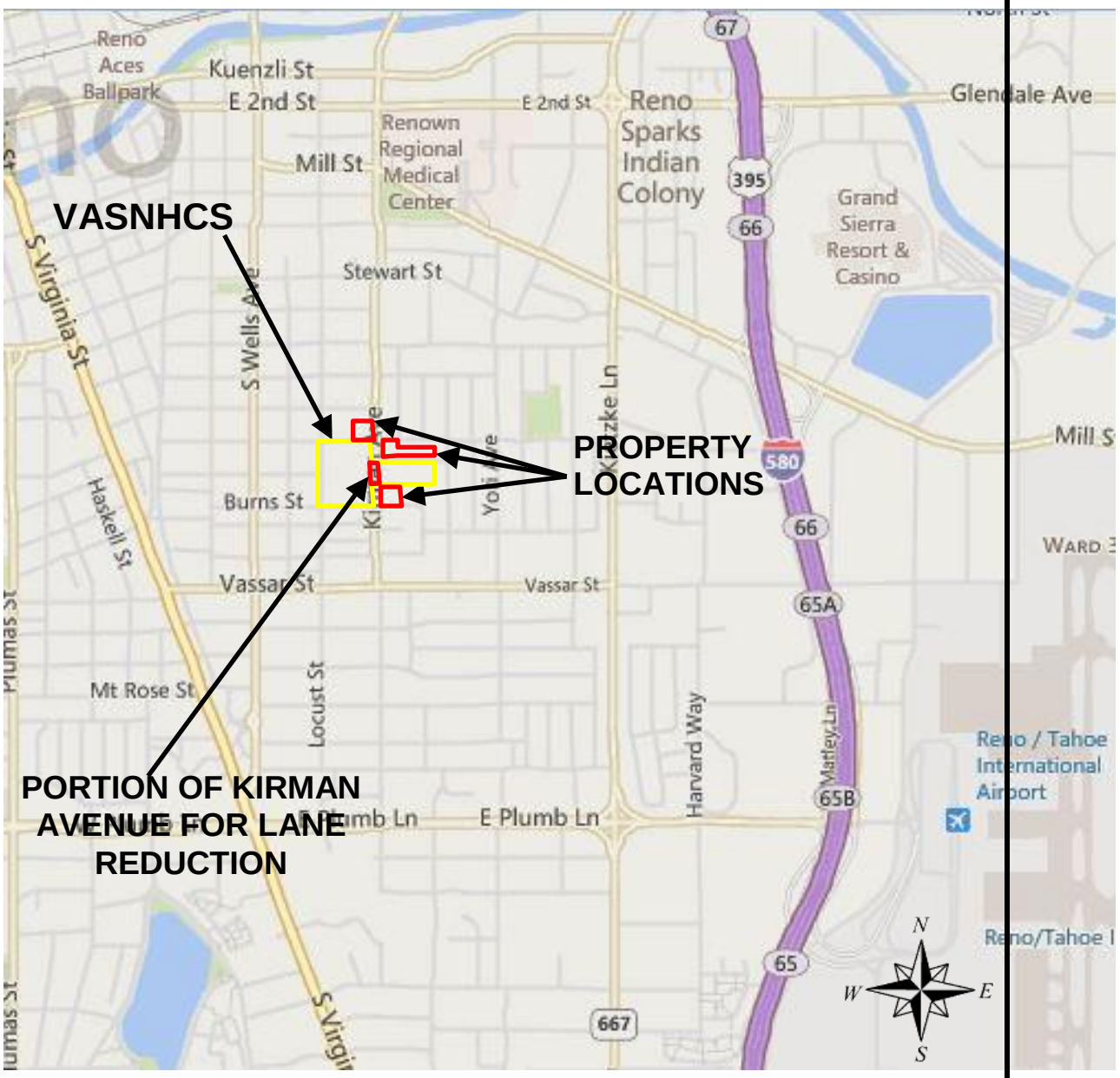

FIGURE 3 **VICINITY STREET MAP** ENVIRONMENTAL ASSESSMENT PROPOSED VASNHCS PARKING LOTS AND KIRMAN AVENUE MODIFICATION RENO, NEVADA	PREPARED FOR **U.S. DEPARTMENT OF VETERANS AFFAIRS** **WASHINGTON, D.C.** TTL PROJECT NO. 12181.02

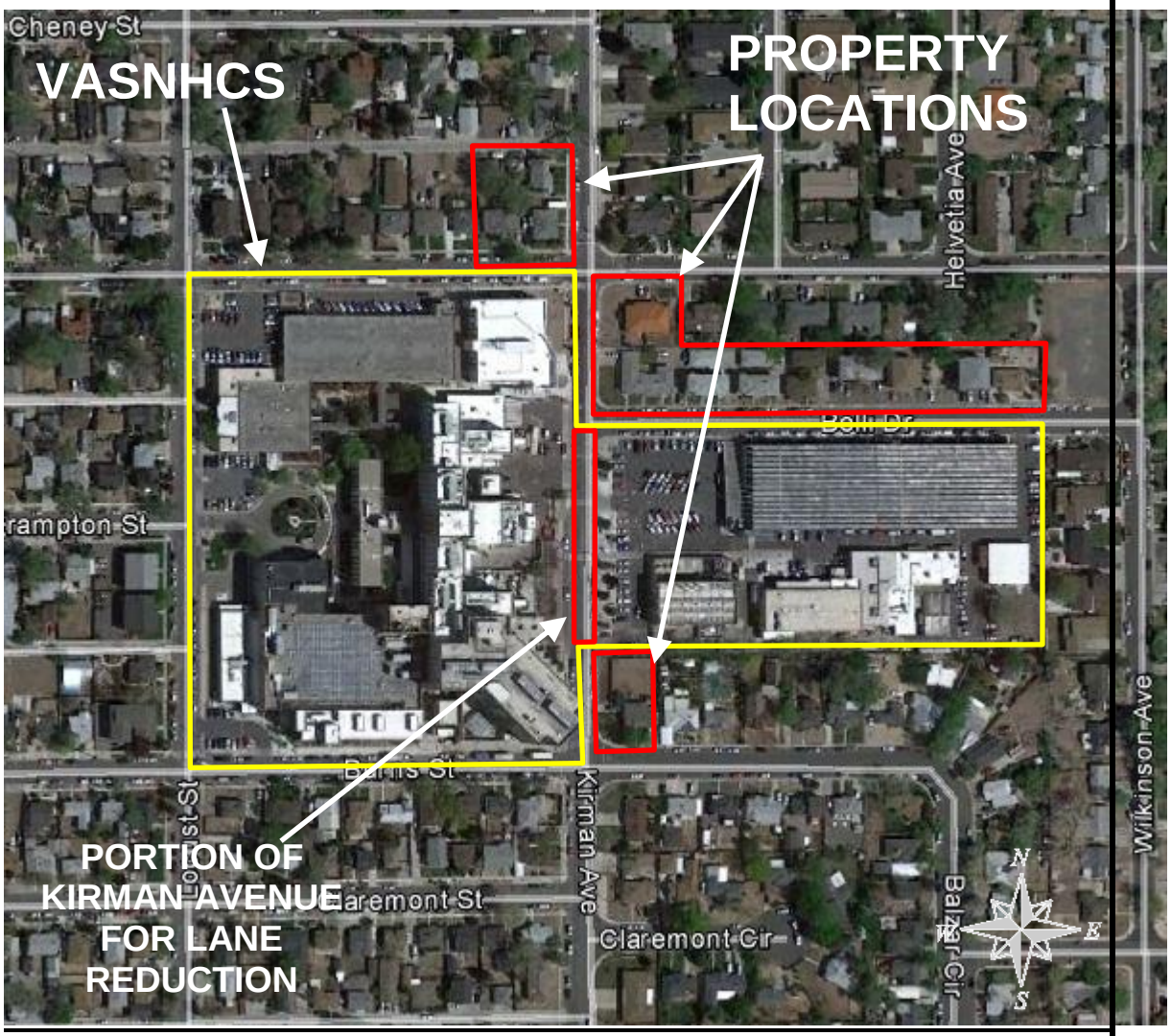

FIGURE 4 **2014 AERIAL PHOTOGRAPH** ENVIRONMENTAL ASSESSMENT PROPOSED VASNHCS PARKING LOTS AND KIRMAN AVENUE MODIFICATION RENO, NEVADA	PREPARED FOR **U.S. DEPARTMENT OF VETERANS AFFAIRS** **WASHINGTON, D.C.** TTL PROJECT NO. 12181.02 TTL associates inc Environmental, Geotechnical Engineering & Testing

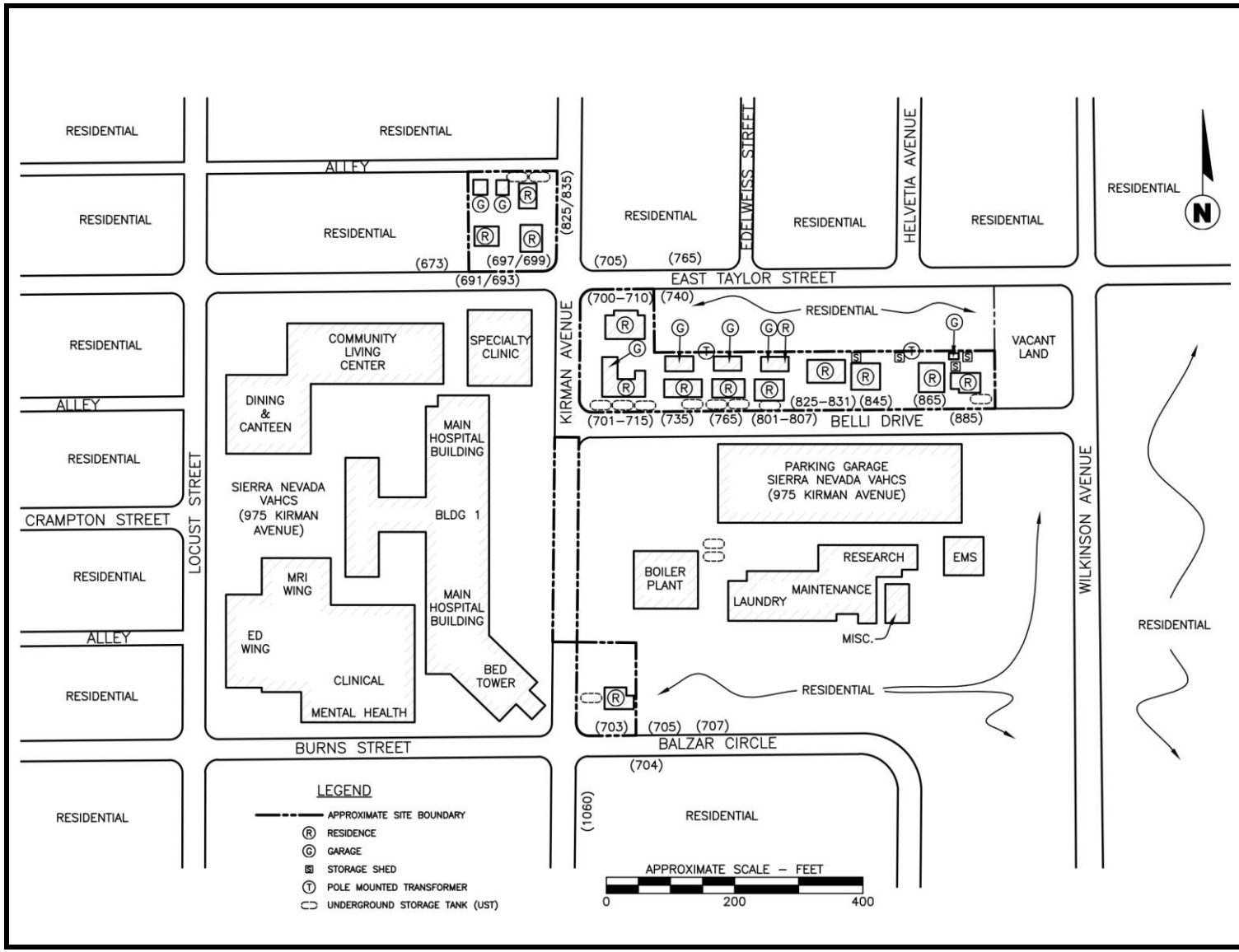

FIGURE 5
SITE PARCELS AND VICINITY SKETCH

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS PARKING LOTS AND KIRMAN AVENUE MODIFICATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C

TTL PROJECT NO. 12181.02

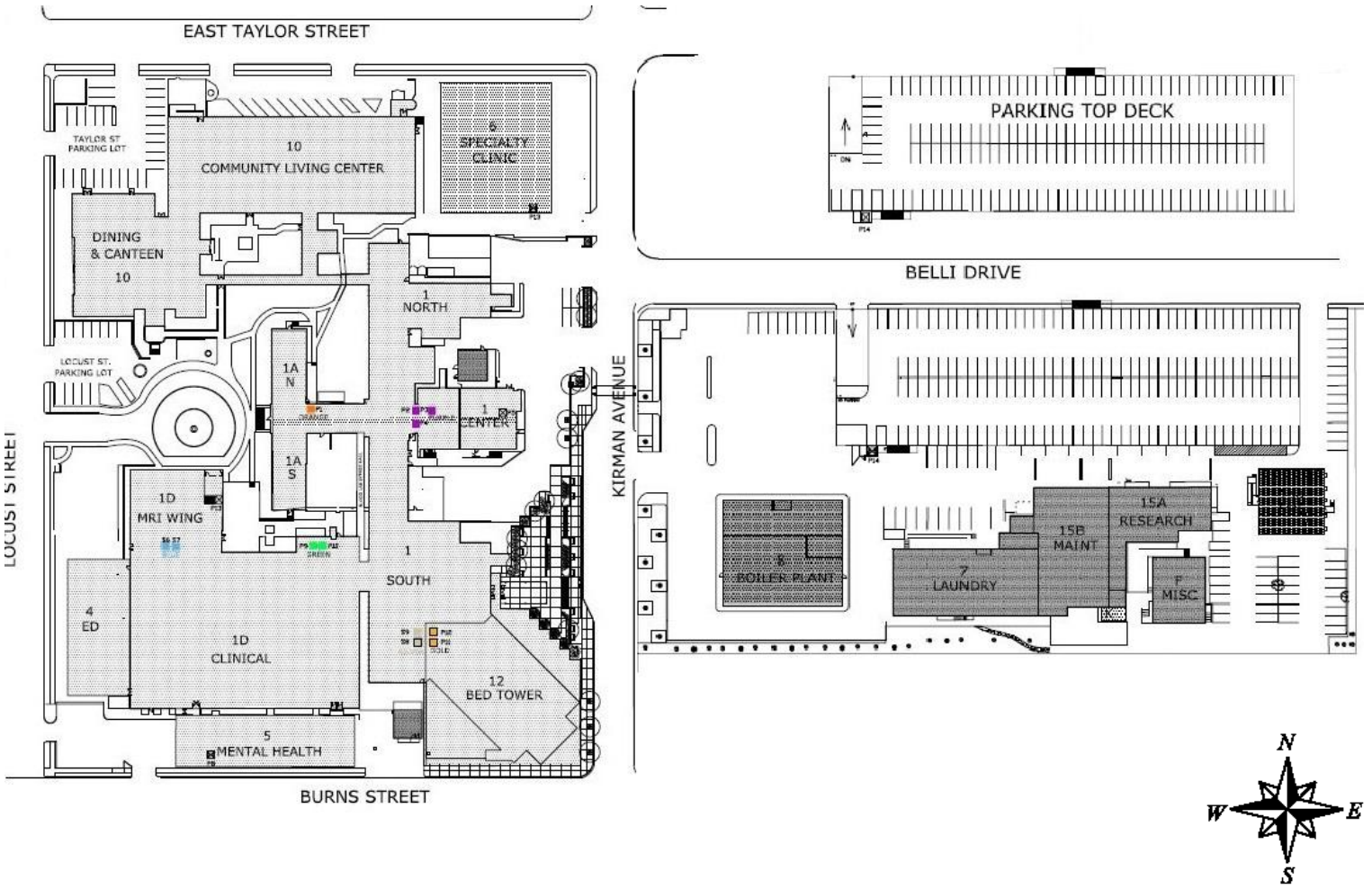

FIGURE 6
VASNHCS
CAMPUS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS PARKING LOTS AND KIRMAN AVENUE MODIFICATION
RENO, NEVADA

PREPARED FOR

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1.3 Purpose and Need

The ***purpose*** of the Proposed Action is to provide additional parking capacity in the vicinity of the VASNHCS campus that would help alleviate the current and future projected parking space deficits at the VASNHCS and to improve the safety of VASNHCS patients and staff crossing Kirman Avenue between the eastern and western portions of the campus. The Proposed Action would provide additional surface level parking to help meet the unmet parking needs of Veterans seeking healthcare services at the VASNHCS and medical center staff. The proposed parking lots would also help meet the parking needs of contractors during planned campus construction activities. The Proposed Action would also modify Kirman Avenue to increase safety for patients, staff, and visitors who cross Kirman Avenue from the primary parking areas to the primary hospital facilities.

This Proposed Action is ***needed*** to help address the current and projected long-term parking deficiency at the VASNHCS campus and to address pedestrian safety issues for patients, staff, and visitors that are required to cross Kirman Avenue between the eastern and western portions of the campus.

The VASNHCS is land locked on an approximately 12.5-acre campus, which currently supports over 540,000 square feet of patient care, related structures, a two-story parking garage and seven small parking lots. The VASNHCS campus is currently divided into east and west portions by Kirman Avenue with the majority of medical care operations to the west of Kirman Avenue and the majority of support functions and on-campus parking to the east of Kirman Avenue.

From Fiscal Year (FY) 2007 to FY 2014, the number of patients receiving healthcare services at the VASNHCS grew from 25,000 per year to over 35,000 per year (an increase of over 40 percent) and the number of outpatient visits increased from 244,000 per year to 420,000 per year (over 70 percent increase). VA anticipates that Reno area Veterans need for healthcare services and, consequently, VASNHCS's workload will continue to grow in the future.

The VASNHCS campus currently includes approximately 578 VA-owned, on-campus parking spaces provided by the parking garage on the eastern portion of the campus and seven small surface parking lots. A parking demand analysis conducted by VA found that the facility is currently operating under an approximately 580 parking space deficit that is projected to increase for the foreseeable future. The VASNHCS currently relies on street parking in the residential neighborhoods surrounding the campus to overcome the on-campus parking deficiency. This has resulted in overutilization of the residential street parking, traffic congestion, and pedestrian hazards. Planned future VASNHCS projects include the construction of an additional parking structure on the eastern portion of the campus; however, the structure would not fully address the parking deficiency. In addition, the proposed construction activities would temporarily eliminate some existing on-campus parking, which would exacerbate the parking shortfall.

The Proposed Action would provide additional land for the creation of new VA-owned parking, which would partially eliminate the long-term VASNHCS parking deficit and would reduce the parking impacts associated with the planned campus construction activities.

Kirman Avenue is a southbound, two-lane, one-way road with parallel parking on both sides of the street. During each weekday, approximately 3,400 vehicles use the segment of Kirman

Avenue that separates the eastern and western portions of the VASNHCS campus. The main curbside drop-off area for the medical center is located along the western side of Kirman Avenue within this segment. Primary parking for the medical center is provided by the parking garage and surface lots located east of Kirman Avenue, requiring patients and staff to cross Kirman Avenue. VA, in conjunction with the City of Reno, has installed a mid-block crosswalk with a flashing beacon to provide safe passage between the parking area and the medical center. However, this section of Kirman Avenue is congested and dangerous to cross, especially for medical center patients, who by their nature, walk more slowly.

The proposed modification of the section of Kirman Avenue that bisects the campus would moderate and control the flow of traffic in this area to improve pedestrian safety and traffic flow in and around the VASNHCS campus.

1.4 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed acquisition of land adjoining VASNHCS campus for the construction and operation of surface parking lots and the proposed modification of the section of Kirman Avenue that bisects the VASNHCS campus.

VA, as a Federal agency, is required to incorporate environmental considerations into their decision-making process for the actions they propose to undertake. This is done in accordance with the regulations identified in Section 1.1.

In accordance with the above regulations, VA has prepared this EA. This EA allows for public input into the Federal decision-making process; provides Federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; and documents the NEPA process.

Ultimately, VA will decide, in part based on the analysis presented in this EA and after having taken potential environmental, cultural, and socioeconomic effects into account, whether VA should implement the Proposed Action, and, as appropriate, carry out mitigation and management measures to reduce effects on the environment.

1.5 Related Environmental Documents

Related Environmental Documents include:

- Cultural and Historic Resources Survey, VA Sierra Nevada Healthcare System. Diablo Green Consulting, Inc., February 2015.
- Phase I Environmental Site Assessment, TTL Associates, Inc., May 2015.
- VA Hospital Kirman Avenue Abandonment Traffic Analysis, Solaegui Engineers, Inc., August 2014.

SECTION 2: DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This Section provides the reader with necessary information regarding the Proposed Action and its alternatives, including those that VA initially considered, but eliminated, and the reasons for eliminating them. The screening criteria and process developed and applied by VA to hone the number of viable sites are described, providing the reader with an understanding of VA's rationale in ultimately analyzing one action alternative, the Preferred Action Alternative, in this EA.

2.2 Proposed Action

VA's Proposed Action is to acquire land adjoining the VASNHCS campus and, due to a shortage of on-campus parking, construct and operate surface parking lots. These new parking lots would be used by VASNHCS staff, Veteran patients, and visitors, who currently park on the streets surrounding the VASNHCS. The parking lots may also be used by contractors during planned construction projects at the VASNHCS.

VA may consider the development of other VASNHCS-related uses on the acquired parcels in the future; however, these potential other uses are not defined at this time and are not included in this Proposed Action. If other VASNHCS-related uses are planned in the future, they would be addressed in a future supplemental NEPA analysis, as applicable, prior to development.

VA's Proposed Action also includes the modification of the section of Kirman Avenue that bisects the VASNHCS campus. Primary parking at the campus is located east of Kirman Avenue and the medical center buildings are located west of Kirman Avenue. VA's proposed modification would provide improved safety for patients and staff crossing Kirman Avenue between the eastern and western portions of the campus.

2.3 Alternatives Analysis

The NEPA, CEQ Regulations, and 38 CFR Part 26 require all reasonable alternatives to be rigorously explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would enable VA to meet the purpose of and need for the Proposed Action (provide additional parking for the VASNHCS campus and improve the safety of pedestrians crossing Kirman Avenue between the eastern and western portions of the campus). "Unreasonable" alternatives would not enable VA to meet the purpose of and need for the Proposed Action.

2.3.1 Alternatives Development

VA undertook a sequential planning and screening process, seeking reasonable alternatives for the Proposed Action.

After identifying the need for additional on-campus parking to accommodate the needs of VASNHCS patients and staff, VA examined the existing campus for the creation of additional on-site parking. The campus is fully developed and space for additional construction is limited.

VA considered the construction of a new parking garage in one or more of the existing on-campus parking lots; however, these lots were found to be too small to support an adequately sized structure. In addition, the construction of a parking garage in these areas would limit future planned construction projects at the campus. VA also considered the construction of additional levels on the existing parking structure. However, the existing parking garage is nearing the end of its design life and is not structurally suitable for the construction of additional levels. VA considered demolishing the existing parking structure and replacing it with a new, larger structure. While this would provide additional needed parking capacity, it would result in the temporary loss of approximately 330 parking spaces provided by the current structure during construction, which would greatly exacerbate the current parking shortage. Therefore, this alternative was eliminated. VA also considered the demolition and/or relocation of some of the smaller structures in the southeastern portion of the campus for the construction of a new parking structure. However, this alternative would temporarily eliminate approximately 70 existing parking spaces during construction, which would exacerbate the current parking shortage. Therefore, this alternative was eliminated from further consideration for this Proposed Action. However, VA plans to construct a new parking garage in this area in the future, once the new proposed surface parking lots are established. The new parking garage would be needed because the proposed new parking lots would provide a maximum of 200 new parking spaces, which would not fully address the parking shortage (580 parking spaces).

VA previously leased and operated an off-campus satellite parking lot at Park Lane Mall in an attempt to partially address the on-campus parking deficiency. However, patients and staff elected to park on streets in the vicinity of the campus and walk to their appointments or work in lieu of parking at the satellite parking lot and using the VA-provided free shuttle service to and from the campus. Based on this past experience, VA eliminated off-campus satellite parking options to address the parking shortage.

Through this analysis, VA determined that the acquisition of additional land adjoining the VASNHCS campus for the development of surface parking lots best met its needs for additional VA-owned, on-site parking.

VA initially considered the complete closure of the section of Kirman Avenue that bisects the campus as the most desirable solution to address pedestrian crossing problem. This option would have eliminated the need to cross Kirman Avenue and would have improved the continuity of the campus, providing VA increased options for possible future campus development and reconfiguration. Building an elevated walkway with stairs over Kirman Avenue was not considered feasible due to the physical limitations of many Veterans patients. In addition, Federal standards do not permit the construction of pedestrian skywalks over public roads due to new security standards. VA also approached the City of Reno with a request to install a pedestrian traffic signal to permit safe crossing between the eastern and western portion of the campus; however, the City of Reno responded that national traffic and pedestrian traffic standards do not justify the installation of a pedestrian traffic signal.

VA approached the City of Reno and local resident groups regarding the possible closure of this portion of Kirman Avenue. The local resident groups expressed concern that the complete closure of this section of Kirman Avenue would worsen already strained traffic conditions in the

VASNHCS area and requested that VA consider other options to improve pedestrian safety. Through additional evaluation and meetings with the City of Reno and local resident groups, VA found that modification of Kirman Avenue to moderate and control traffic flow adjacent to the campus, yet maintaining the flow of through traffic on one lane, would improve pedestrian safety and was supported by area residents and the City of Reno.

2.3.2 Evaluated Alternatives

This EA examines in-depth two alternatives, the Preferred Action Alternative and the No Action Alternative, defined as follows:

Preferred Action Alternative

VA's Preferred Action Alternative is to acquire up to 11 parcels of residential land (approximately two acres) adjoining to the north and east of the existing VASNHCS campus across East Taylor Street, Kirman Avenue, and Belli Drive for the construction and operation of surface-level parking lots and the reduction of Kirman Avenue to one lane between the eastern and western portions of the VASNHCS campus.

The 11 parcels identified for possible acquisition include the following:

- **691/693 East Taylor Street** – one duplex residence and associated garage.
- **697/699 East Taylor Street** – one duplex residence.
- **825/835 Kirman Avenue** – one duplex residence and associated garage.
- **700 – 710 East Taylor Street** – one duplex residence.
- **701 – 735 Belli Drive** – one triplex residence with an associated garage and one small apartment building with an associated garage.
- **765 – 807 Belli Drive** – one small apartment building with an associated garage, one duplex residence, and one garage with apartments.
- **825 – 831 Belli Drive** – one quadplex residence.
- **845 Belli Drive** – one small apartment building.
- **865 Belli Drive** – one small apartment building.
- **885 Belli Drive** – one single-family residence.
- **703 Balzar Circle** – one single-family residence.

VA would seek to purchase the 11 parcels of land from willing landowners through negotiation. Several of the property owners have expressed interest in selling their land to VA. VA would negotiate to acquire as many of the parcels as voluntarily available and would base the parking lot design on the land acquired. No parking lot design information is available at this time.

However, VA estimates that if all 11 parcels were to be acquired, up to 200 parking spaces would be constructed on the acquired land.

As part of the Preferred Action Alternative, the current buildings and other improvements (i.e., structural components, utilities, pavement, and landscaping) would be removed from the acquired land and the parking lots would be designed and built to VA's specifications by a VA-selected contractor. The land and parking lots would be owned and maintained by VA as part of an expanded VASNHCS campus. Figures 2 through 5 depict the 11 proposed acquisition parcels/parking lot locations.

VA may consider the development of other VASNHCS-related uses on the acquired parcels in the future; however, these other potential uses are not defined at this time and are not included in this Proposed Action. If other VASNHCS-related uses are planned in the future, they would be addressed in a future supplemental NEPA analysis, as applicable, prior to development.

The section of Kirman Avenue between the eastern and western portions of the VASNHCS campus would be modified to moderate and control the flow of traffic adjacent to the campus to improve the safety of VASNHCS Veteran patients, staff, and visitors crossing this section of road. Modifications would include the reduction of the two southbound lanes on this one-way section of road to one southbound lane. The roadway modifications would be designed in coordination with the City of Reno.

The Preferred Action Alternative effectively provides the best combination of adjacent land and close proximity to increase VASNHCS parking and improve pedestrian safety. The Preferred Action Alternative would reduce VA's current and projected parking deficiencies, would reduce VA's reliance on street parking in the adjacent residential neighborhoods, and would improve the safety of VASNHCS patients, staff, and visitors who cross from campus parking facilities east of Kirman Avenue to the medical center buildings west of Kirman Avenue.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented and operations at the VASNHCS campus would continue as currently conducted. Parking at the VASNHCS campus would continue to be deficient. VA would continue to rely on over utilized street parking in the residential neighborhoods surrounding the VASNHCS to overcome the on-campus parking deficiency, and associated traffic congestion and pedestrian hazards would persist. The proposed acquisition parcels would likely continue in their current residential use. In addition, the section of Kirman Avenue that bisects the campus would not be modified and would remain dangerous to cross for VASNHCS patients, staff and visitors.

The No Action Alternative would not reduce the parking deficiency at the VASNHCS, would not enable VA to provide adequate parking to U.S. Veterans and VASNHCS staff, and would not improve pedestrian safety. However, the No Action Alternative is assessed in this EA to provide a comparative baseline analysis, as required under the CEQ Regulations.

2.3.3 Alternatives Eliminated From Further Consideration

As described in Section 2.3.1, VA considered options to address the on-site parking deficiency at the VASNHCS campus through a screening process. Each of the initially considered options, with the exception of the Preferred Action Alternative, did not meet the screening criteria. VA

determined that existing surface parking lots on the VASNHCS campus were too small for the construction of an adequately sized parking structure and that the existing on-campus parking garage is not structurally suitable for the construction of additional parking levels. The demolition and/or relocation of the existing small structures in the southeastern portion of the campus for the construction of a new parking garage was also eliminated from further consideration for this Proposed Action due to the exacerbation of the parking shortage during construction. However, VA plans to construct a new parking garage in this area in the future, once the new parking lots are established, as part of a separate proposed action. The demolition of the existing on-campus parking garage and the construction of a new larger parking garage in its location was also eliminated due to the associated temporary loss of parking spaces during the construction activities. In addition, based on previous experience, leasing and operating an off-campus satellite parking lot and shuttle service was not considered a viable alternative.

VA also initially considered the complete closure of the section of Kirman Avenue that bisects the campus to address the pedestrian crossing safety issues. However, based on concerns expressed by local residents and the City of Reno, this alternative was eliminated from further consideration.

SECTION 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) environmental, cultural, and socioeconomic conditions at the 11 proposed acquisition parcels (Site parcels), and their general vicinity (i.e., the Proposed Action's Region of Influence (ROI)), with emphasis on those resources potentially impacted by the Proposed Action. Appendix B provides photographs, with captions, of the Site parcels and their vicinities. Under each resource area, the potential direct and indirect effects of implementing the Preferred Action Alternative and the No Action Alternative are identified. Potential cumulative impacts are discussed in Section 3.17.

In this EA, impacts are identified as significant, less-than-significant (i.e., common impacts that would not be of the context or intensity to be considered significant under the NEPA or CEQ Regulations), or no impact. As used in this EA, the terms "effects" and "impacts" are synonymous. Where appropriate and clearly discernible, each impact is identified as either adverse or positive.

The CEQ Regulations specify that in determining the significance of effects, consideration must be given to both "*context*" and "*intensity*" (40 CFR 1508.27):

Context refers to the significance of an effect to society as a whole (human and national), to an affected region, to affected interests, or to just the locality. In other words, the context measures how far the effect would be "felt."

Intensity refers to the magnitude or severity of the effect, whether it is beneficial or adverse. Intensity refers to the "punch strength" of the effect within the context involved.

In this EA, the significance of potential direct, indirect, and cumulative effects has been determined through a systematic evaluation of each considered alternative in terms of its effects on each individual environmental resource component.

Significance criteria for resource areas considered in this EA are as follows:

- *Aesthetics.* An alternative could significantly affect visual resources if it resulted in abrupt changes to the complexity of the landscape and skyline (i.e., in terms of vegetation, topography, or structures) when viewed from points readily accessible by the public.

- *Air quality.* An alternative could have a significant air quality effect if it would result in substantially higher air pollutant emissions or cause established air quality standards to be exceeded.

- *Cultural resources.* An alternative could have a significant effect on cultural resources if it would: result in damage, destruction, or demolition to an archaeological site or building that is eligible or listed on the National Register of Historic Places; promote neglect of such a resource, resulting in resource deterioration or destruction; introduce audio or

visual intrusion to such a resource; or decrease access to resources of value to federally recognized Native American tribes. Impact assessment for cultural resources focuses on properties that are listed in or considered eligible for the National Register of Historic Places or are National Historic Landmarks.

- *Geology and Soils.* If an alternative would result in an increased geologic hazard or a change in the availability of a geologic resource, it could have a significant effect. Such geologic and soil hazards would include, but not be limited to, seismic vibration, land subsidence, and slope instability.

- *Hydrology and Water Quality.* If an alternative would result in a reduction in the quantity or quality of water resources for existing or potential future use, it could have a significant effect. A significant effect could occur if the demand exceeded the capacity of the potable water system.

- *Wildlife and Habitat.* The effect of an alternative on biological resources and ecosystems could be significant if it would disrupt or remove any endangered or threatened species or its designated critical habitat. The loss of a substantial number of individuals of any plant or animal species (sensitive or non-sensitive species) that could affect the abundance or diversity of that species beyond normal variability could also be considered significant. The measurable degradation of sensitive habitats, particularly wetlands, could also be significant.

- *Noise.* An alternative could have a significant noise effect if it would generate new sources of substantial noise, increase the intensity or duration of noise levels to sensitive receptors, or result in exposure of more people to unacceptable levels of noise.

- *Land use.* If an alternative would conflict with adopted plans and goals of the affected community or if it would result in a substantial alteration to the present or planned land use of an area, it could have a significant direct effect. If an alternative would result in substantial new development or prevent such development elsewhere, it could have a significant indirect effect. In addition, an alternative could significantly affect visual resources if it resulted in abrupt changes to the complexity of the landscape and skyline (i.e., in terms of vegetation, topography, or structures) when viewed from points readily accessible by the public.

- *Floodplains, Wetlands, and Coastal Zone Management.* An alternative could have a significant effect on water resources if it would cause substantial flooding or erosion, if it would subject people or property to flooding or erosion, or if it would adversely affect a significant water body, such as a stream or lake.

- *Socioeconomics.* If an alternative would substantially alter the location and distribution of the population within the geographic "region of influence," cause the population to exceed historical growth rates, or substantially affect the local housing market and vacancy rates, the effect would be significant. Significant effects could occur if an alternative caused disproportionate risks to children that resulted from environmental health risks or safety risks. In addition, an alternative could have a significant effect if it would create a need for new or increased fire or police protection, or medical services, beyond the current capability of the local community, or would decrease public service capacities so as to jeopardize public safety. *It is important to note that, per CEQ*

Regulations (40 CFR 1508.14), social or economic effects are not intended by themselves to require preparation of an EIS. Only when social or economic effects are interrelated with natural or physical environmental effects will all of these effects be analyzed as part of the NEPA process.

- *Community Services.* An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition.

- *Solid and Hazardous Materials.* An alternative could have a significant effect if it would result in a substantial increase in the generation of hazardous substances, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation. Data provided in the site-specific ESAs and other prior HTMW studies helps to identify these potential impacts, as well as their significance.

- *Transportation and Parking.* An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition. For instance, an alternative could have a significant effect on traffic if it would increase the volume of traffic beyond the existing road capacity, cause parking availability to fall below minimum local standards, or require new or substantially improved roadways or traffic control systems.

- *Utilities.* An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition.

- *Environmental Justice.* Significant effects could occur if an alternative would disproportionately affect minority or low-income populations.

3.2 Aesthetics

The Site includes 11 parcels of residential land (approximately two acres) located in an urban, fully developed area located approximately 1.2 miles southeast of the center of the City of Reno. The northern portion of the Site includes three parcels located at the northwest corner of Kirman Avenue and East Taylor Street (691/693 and 697/699 East Taylor Street and 825/835 Kirman Avenue). The northern Site parcels include approximately 0.4 acre of land and are occupied by three duplex residences and two associated garages. The central portion of the Site includes seven parcels located east of Kirman Avenue between Belli Drive and East Taylor Street (700-710 East Taylor Street and 701-735, 765-807, 825-831, 845, 865, and 885 Belli Drive). The central Site parcels total approximately 1.4 acres and are occupied by one single-family residence, two duplex residences, one triplex residence, one quadplex residence, four small apartment buildings and three associated garages. The southern portion of the Site includes one parcel at the northeast corner of Kirman Avenue and Balzar Circle (703 Balzar Circle). The southern Site parcel is approximately 0.2 acre and is occupied by a single-family residence.

All of the Site parcels are located immediately adjacent to or adjoining the existing VASNHCS campus across a public road (Kirman Avenue, East Taylor Street, or Belli Drive). The remaining area surrounding the Site parcels is occupied by single-family and multi-family residences.

Aesthetics are managed by the City of Reno through the Chapter 8.32 (Trees and Shrubs), Chapter 18.12 (General Development and Design Standards), and Chapter 18.08 (Zoning) of the Reno Land Development Code (RLDC).

3.2.1 Effects of the Preferred Action Alternative

The Preferred Action Alternative would result in less-than-significant adverse aesthetic impacts. The new parking lots would change the appearance of the Site parcels, but would not represent an abrupt change to the visual resources of the area. The parking lots would be designed and constructed in a way that is visually consistent with the surrounding areas. The modification of Kirman Avenue between eastern and western portions of the VASNHCS campus would likely result in less-than-significant positive aesthetic impacts.

The Site parcels are located in an urban, mixed institutional and residential use area, with surrounding single-family and multi-family residential structures to the north and east and the VASNHCS campus to the south and west. The Proposed Action would demolish and remove aging, predominantly multi-family residential structures and replace them with well-maintained parking lots. The proposed parking lots would be visible from adjoining properties; however, the parking lots would be designed and constructed in a way that is visually consistent with the adjacent VASNHCS development, including landscaping. Lighting associated with the parking lots would likely increase night time ambient light levels. However, VA would install focused lighting with baffles to prevent significant spillage of light on to adjacent properties. In addition, based on the urban nature of the Site parcels and the proximity of the adjoining, well-lit VASNHCS campus, the lighting impacts are anticipated to be less-than-significant.

The proposed modification of Kirman Avenue between East Taylor Street and Burns Street would result in direct positive aesthetic impacts by redesigning that portion of Kirman Avenue to accommodate one lane of traffic, resulting in a reduced volume of vehicle traffic along that portion of Kirman Avenue. The redesign of Kirman Avenue between East Taylor Street and Burns Street would also include additional landscaping and pedestrian-friendly improvements that would enhance the appearance of this section of road.

3.2.2 Effects of the No Action Alternative

Under the No Action Alternative, no aesthetics impacts by VA would occur.

3.2.3 Mitigation/Management Measure

No project-specific mitigation measures are required. Aesthetic impacts in general, would be maintained at less-than-significant levels through project planning and development, to the extent practicable, in accordance with Chapter 8.32 (Trees and Shrubs), Chapter 18.12 (General Development and Design Standards), and Chapter 18.08 (Zoning) of the RLDC. In addition, VA would implement the following BMPs to reduce aesthetic impacts:

- Install focused lighting with baffles at the parking lots to prevent significant spillage of light on to adjoining properties.

- Include additional landscaping and pedestrian-friendly improvements in the design of the Kirman Avenue modifications.

3.3 Air Quality

3.3.1 Regulatory Background

Ambient Air Quality

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act, as amended (CAA and CAAA) requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the following principal pollutants, called “criteria pollutants” (as listed under Section 108 of the CAA):

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO_x)
- Ozone (O_3)
- Particulate matter (PM), divided into two size classes:
  - Aerodynamic size less than or equal to 10 micrometers (PM_{10})
  - Aerodynamic size less than or equal to 2.5 micrometers ($PM_{2.5}$)
- Sulfur dioxide (SO_2)

Areas are designated by the USEPA as “attainment”, “non-attainment”, “maintenance”, or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. In areas where the applicable NAAQS are not being met, a “non-attainment” status is designated. Areas that have been classified as "non-attainment" but are now in compliance can be re-designated "maintenance" status if the state completes an air quality planning process for the area. Areas for which no monitoring data is available are designated as “unclassified”, and are by default considered to be in attainment of the NAAQS.

According to the Washoe County Air Quality Management Division and USEPA, the Reno area of Washoe County is designated as a *maintenance* area for PM_{10} and carbon monoxide. Washoe County is designated as a *full-attainment* area or is not classified for all other criteria pollutants (Washoe County Air Quality Management Division, 2016).

Greenhouse Gases and Climate Change

Gases that trap heat in the atmosphere are often called greenhouse gases (GHG). Some greenhouse gases, such as carbon dioxide occur naturally and are emitted to the atmosphere through natural processes and human activities. Other greenhouse gases (e.g., fluorinated gases) are created and emitted solely through human activities. The principal greenhouse gases that enter the atmosphere because of human activities are:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Fluorinated gases (e.g., hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride)

Gases in the atmosphere can contribute to the greenhouse effect both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other greenhouse gases, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the earth. It is now well established that rising global atmospheric GHG emission concentrations are significantly affecting the Earth's climate. Based primarily on scientific assessments, the USEPA has issued a finding that the changes in our climate caused by increased concentrations of atmospheric GHG emissions endanger public health and welfare.

The USEPA requirements for Mandatory Reporting of Greenhouse Gases Rule (74 FR 56260), which requires reporting of greenhouse gas data and other relevant information from large sources and suppliers in the United States, are designed to collect accurate and timely GHG data to inform future policy decisions. EOs 13423 and 13514 require Federal agencies to reduce GHG emissions by 30 percent by the end of fiscal year 2015.

Operating Permits

The CAA regulates criteria pollutants as well as 188 specifically listed hazardous air pollutants (HAPs). The Title V Operating Permit Program under 40 CFR 70 requires sources that meet the definition of a "major source" of criteria pollutants or HAPs to apply for and obtain a Title V operating permit. A major source of HAPs has the potential to emit (PTE) more than 10 tons per year (tpy) of any individual HAP, or 25 tpy of any combination of HAPs. The definition of major source for criteria pollutants is dependent on the air quality attainment status of the region where the source is located (i.e., areas that are in attainment or non-attainment with the NAAQS). Major sources have a PTE more than 100 tpy of any criteria pollutant in an attainment area or lower levels in various classifications of non-attainment (i.e., marginal, moderate, serious, severe, and extreme).

Given current residential use of the Site parcels, no significant sources of air emissions exist (e.g., from boilers, generators, or other minor equipment). The Site parcels do not have and are not required to have a Title V operating permit.

State and Local Regulations

Nevada Administrative Code (NAC) Chapter 445B (Air Control) contains provisions to protect Nevada's air quality through monitoring, inspection, permitting, and rules, and is administered by the Nevada Division of Environmental Protection (NDEP); however, according to the NDEP, Bureau of Air Pollution Control, the responsibility of maintaining air quality in the City of Reno has been delegated by the NDEP to the Washoe County Air Quality Management Division (WCAQMD). The WCAQMD air quality regulations require a permit for the construction of a new air emissions source, modifying an existing air emissions source, or operating a new air emissions source.

Conformity with State Implementation Plans

The General Conformity Provision of the CAA of 1970 (42 USC 7401 *et seq*.; 40 CFR Parts 50-87) Section 176(c), including the USEPA's implementation mechanism, the General Conformity Rule (40 CFR Part 51, Subpart W), prohibits the Federal government from conducting, supporting, or approving any actions that do not conform to a USEPA-approved State

Implementation Plan (SIP). A SIP is a state's self-authored blueprint for achieving and maintaining compliance with the goals of the CAA. Federal agencies prepare written Conformity Determinations for Federal actions in or affecting NAAQS non-attainment areas or maintenance areas when the total direct and indirect emissions of non-attainment pollutants (or their precursors) exceed specified thresholds. Conformity with the SIP is demonstrated if project emissions fall below threshold values.

According to the WCAQMD and USEPA, the Reno area of Washoe County is designated as a *maintenance* area for PM_{10} and carbon monoxide. Washoe County is designated as *full-attainment* or is not classified for all other criteria pollutants (Washoe County Air Quality Management Division, 2016).

3.3.2 Sensitive Receptors

Sensitive air quality receptors in the vicinity of Site parcels include the surrounding residential neighborhoods and the adjoining VASNHCS. In addition, Veterans Memorial Elementary School (1200 Locust Street) is located approximately 600 feet south-southwest of the southern Site parcel; Bailey Charter Elementary School (1090 Bresson Avenue) is located approximately 900 feet southeast of the central Site parcels; Vaughn Middle School (1200 Bresson Avenue) is located approximately 1,100 feet southeast of the central Site parcels; and Booth Elementary School (425 East 9th Street) is located approximately 1,150 feet northeast of the central Site parcels. There are no other hospitals or schools located within 2,500 feet of Site parcels. No other sensitive air quality receptors were identified in the site area.

3.3.3 Effects of the Preferred Action Alternative

Air emissions generated from the Proposed Action would have less-than-significant direct and indirect, short-term and long-term adverse impacts to the existing air quality environment. Impacts would include short-term increased air emission levels as a result of demolition and construction activities and long-term increased air emissions levels as a result of the proposed parking lots.

Demolition and construction activities would be performed in accordance with Federal, State and local air quality requirements. Requirements would include compliance with WCAQMD regulations and an approved permit for construction under Section 030.020 of the District Board of Health Regulations Governing Air Quality Management. Construction-related emissions are generally short-term, but may still have adverse impacts on air quality, primarily due to the production of dust. Dust can result from a variety of activities, including excavation, grading, and vehicle travel on paved and unpaved surfaces. Dust from construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. Implementing dust control measures (BMPs) significantly reduces dust emissions from construction. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Construction-related emissions also include the exhaust from the operation of construction equipment. The use of newer construction equipment with emissions controls and minimizing the time that the equipment is idling (BMPs) reduce construction equipment exhaust emissions. Implementation of BMPs, discussed below in Section 3.3.5, would further minimize the anticipated less-than-significant adverse, short-term air quality impacts.

The Site parcels include several residential structures that were mostly constructed in the 1940s and 1950s and are likely to contain asbestos-containing building materials (ACM) and may contain lead-based paint (LBP). Pre-demolition ACM and LBP surveys would be conducted for each of the structures to be demolished as part of the Proposed Action. The surveys would identify and quantify ACMs, which would be removed by licensed asbestos abatement contractors in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) and Washoe County requirements prior to building demolition. Asbestos abatement procedures require the removal of ACM with various controls and monitoring to prevent asbestos emissions. The demolition of buildings containing LBP can result in the generation of LBP-containing dust. Damaged or peeling LBP would be abated prior to building demolition. Standard demolition BMPs to control dust would reduce LBP dust emissions during demolition to less-than-significant levels.

The Proposed Action would not have a significant adverse air quality impact during the operation of the proposed parking lots. Vehicles that would use the parking lots currently park on the streets in the residential areas surrounding the VASNHCS campus. The parking lots would not draw additional vehicles to the area. Therefore, there would be no increase in vehicles, vehicle miles travelled, or associated emissions (including GHG emissions) as a result of the Proposed Action.

The VASNHCS is located in a *maintenance* area for PM_{10} and carbon monoxide. However, the minor increased air emissions from the construction and operation of the proposed parking lots are not anticipated to exceed the *de minimis* emission levels for these NAAQS criteria pollutants.

3.3.4 Effects of the No Action Alternative

Under the No Action Alternative, no air quality impacts by VA would occur.

3.3.5 Mitigation/Management Measures

No project-specific mitigation measures are required. VA would implement the following BMPs and would comply with all applicable Federal, State and local air quality permitting requirements to maintain short-term and long-term air quality effects (i.e., air emissions) at acceptable, less-than-significant levels. These management measures include:

- Complete pre-demolition ACM and LBP surveys for each building proposed for demolition.
- Remove identified ACM and damaged/peeling LBP from buildings to be demolished by Nevada-licensed abatement contractors as required under NESHAP, State and local regulations.
- Use dust suppressants during building demolition to control potential LBP-containing dust emissions.
- Comply with the Washoe County regulations regarding fugitive dust emissions.
- Comply with the Washoe County air quality regulations and obtain an approved permit for construction activities.

- Develop and implement a Construction Emissions Mitigation Plan (CEMP) to reduce impacts from fugitive dust and diesel particulate matter. The CEMP would include measures such as the use of newer construction equipment with emissions controls, minimizing the time that equipment is idling, etc. to reduce construction equipment exhaust emissions.
- Use appropriate dust suppression methods during onsite demolition/construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of demolition and earth-moving activities during high wind conditions.
- Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces.
- Cover haul trucks with tarps.
- Stabilize previously disturbed areas through re-vegetation or mulching if the area would be inactive for several weeks or longer.
- Visually monitor all construction activities regularly, particularly during extended periods of dry weather, and implement dust control measures when appropriate.

In addition, VA would secure and comply with any required air emissions permits from the Washoe County, as appropriate.

3.4 Cultural Resources

Cultural resources are the physical evidence of our heritage. Cultural resources are: historic properties as defined in the National Historic Preservation Act (NHPA), cultural items as defined in the Native American Graves Protection and Repatriation Act (NAGPRA), archeological resources as defined in the Archaeological Resources Protection Act (ARPA), sacred sites as defined in EO 13007 to which access is provided under the American Indian Religious Freedom Act (AIRFA), and collections as defined in 36 CFR 79, *Curation of Federally Owned and Administered Collections*. Requirements set forth in NEPA, NHPA, ARPA, NAGPRA, AIRFA, 36 CFR 79, EO 13007, and Presidential Memorandum on *Government-to-Government Relations with Native American Tribal Governments* define the basis of VA's compliance responsibilities for management of cultural resources. Regulations applicable to VA's management of cultural resources include those promulgated by the Advisory Council on Historic Preservation (ACHP) and the National Park Service (NPS).

3.4.1 Architectural and Archaeological Resources

On behalf of VA, Diablo Green Consulting, Inc. (Diablo Green) completed a Cultural and Historic Resources Survey and Assessment, dated February 23, 2015 (CHRSA report). The CHRSA represented a preliminary cultural resource analysis for the Proposed Action and included a review of readily available data pertinent to the history, prehistory, ethnography, and environment of the area of VASNHCS, identified experts and others likely to be interested in and knowledgeable about the history, archaeology, and culture of the area, and completed a field inspection of the study area.

The CHRSA report found that the 11 Site parcels are associated with three potential historic additions/subdivisions. The Burke's Addition includes the three northern parcels, the Belli

Addition includes the central parcels, and the Mountain View Subdivision includes the southern parcel. None of these additions/subdivisions were found to be listed on the National Register of Historic Places (NRHP).

The CHRSA report stated that structures on eight of the eleven parcels have high architectural integrity per the NRHP, representing a diversity of family houses (duplexes, triplexes, and small apartment complexes) constructed between 1939 and 1958 and have had minimal changes over time. Structures at two other parcels (700-710 East Taylor Street and 885 Belli Drive,) have had significant alterations and did not appear to have integrity. The structure located at 829 Belli Drive is a non-historic resource built in 1972.

The CHRSA report recommended additional research into the three potential historic additions/subdivisions to determine if they contain enough resources and historical significance to be considered NRHP-eligible historic districts. The CHRSA report also recommended more research to determine whether the eleven properties are historic and should be listed on the NRHP.

Diablo Green conducted additional research on behalf of VA and found that both the Burke's Addition and the Belli Addition retain integrity and have a high percentage of contributing properties to be considered eligible as NRHP historic districts. The Mountain View Subdivision lacked integrity and had a high percentage of non-contributing properties. As such, the Mountain View Subdivision was not considered eligible as a potential NRHP historic district.

Diablo Green's additional research found that none of the 11 parcels are eligible for individual listing in the NRHP. However, nine buildings on six of the seven central Site parcels appeared to be contributing properties to the potential Belli Addition historic district.

On June 1, 2015, VA submitted the CHRSA report and other documentation to the Nevada State Historic Preservation Office (SHPO) in accordance with Section 106 of the NHPA to initiate formal Section 106 consultation for the Proposed Action. The June submittal identified the Area of Potential Effect (APE) for the Proposed Action and requested SHPO concurrence on the NRHP eligibility of the 11 parcels being considered for acquisition. On July 1, 2015, SHPO responded with a request for additional information.

VA, Diablo Green and the SHPO discussed the Proposed Action, the characteristics of the individual properties being considered for acquisition, and the potential historic districts in the APE. VA provided additional information to the SHPO in formal submittals dated August 27, 2015, October 30, 2015, and December 28, 2015. VA determined the following regarding the historic resources at the 11 Site parcels:

- None of the 11 parcels are eligible for individual listing on the NRHP.
- The Belli Addition Historic District is eligible for listing in the NRHP as an important example of masonry mid-twentieth century style architecture from 1940 through 1965. As a whole, the subdivision retains very good integrity, particularly the continuity of architectural design, and represents an important period in the history of Reno's suburban growth and development of multi-family housing. Most of the housing developed in the Belli Addition was rental units, perhaps geared to the divorce and gaming industries, as well as employees at the VA hospital.

- The Burke's Addition Historic District is eligible for listing in the NHRP as an important example of masonry mid-twentieth century style architecture from 1904 through 1945. The Wells Avenue Neighborhood Conservation District, dedicated by the City of Reno in 2013, is located adjacent to the west of Burke's Addition, and was previously considered to be potentially eligible for listing in the NRHP with its period of significance beginning in 1904 and terminating in 1945. Burke's Addition was developed as an addition to the Wells Avenue Neighborhood with the majority of the buildings built prior to 1945. Burke's Addition includes a good representative mix of single-family housing styles of good integrity that reflect the period of significance (1904 to 1945).

- Nine properties on six central Site parcels are contributing properties to the Belli Addition Historic District. These include 700-710 East Taylor Street and 701/707/715, 735, 765, 801, 805-807, 845, 865 and 885 Belli Drive. The quadplex building located on the other central Site parcel (829 Belli Drive) was constructed in 1972 and does not contribute to the historic district.

- The properties on the three northern Site parcels (691/693 and 697/699 East Taylor Street and 825/835 Kirman Avenue) are located within the Burke's Addition Historic District, but do not contribute to the district. The multi-family buildings on these parcels, constructed in the late 1940s and early to mid-1950s, represent in-fill development in the district, outside the period of significance (1904 to 1945).

- The southern Site parcel (703 Balzar Circle) does not contribute to a historic district.

- Kirman Avenue forms the boundary between the Burke's Addition and Belli Historic Districts. The road acts as a physical and cultural boundary for the districts, but does not contain any significant character-defining historic features.

Figure 7 depicts the historic districts. Figure 8 depicts the Site parcels that contribute to these districts.

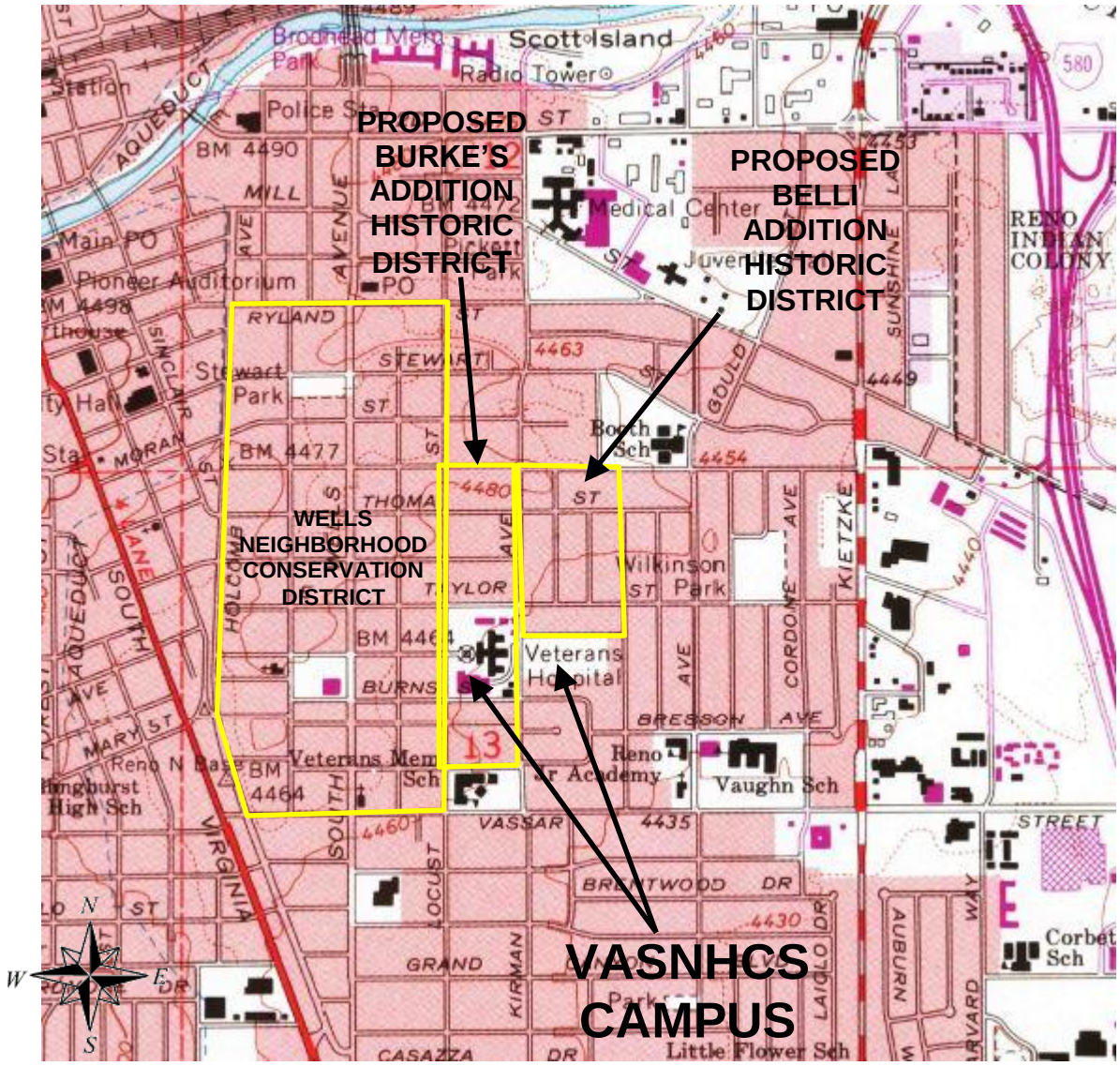

FIGURE 7
HISTORIC DISTRICTS

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS PARKING LOTS AND KIRMAN AVENUE MODIFICATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

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FIGURE 8
SITE PARCELS CONSTRIBUTING TO BELLI ADDITION HISTORIC DISTRICT

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3.4.2 Native American Consultation/Coordination

For proposed actions, Federal agencies are required to consult with Federally-recognized Native American Tribes in accordance with the NEPA, NHPA, NAGPRA, and EO 13175. VA consulted with 29 Federally-recognized Native American tribes as part of this NEPA process, in accordance with 36 CFR 800.2 and EO13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000. These tribes, identified as having possible ancestral ties to the area as identified by the SHPO and/or the Native American Consultation Database (NACD), were invited by VA to participate in the EA process as Sovereign Nations per EO 13175. A coordination and consultation letter was sent to each of these tribes. A list of the tribes that were consulted is provided in Section 10. As of the date of this EA, no responses have been received from the tribes (VA 2015).

3.4.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative could have a significant adverse effect to cultural resources. VA concluded and SHPO concurred that the direct APE for the Preferred Action Alternative includes the 11 Site parcels and adjacent City streets and the indirect APE includes those properties immediately adjacent to the site parcels slated for demolition. Structures on six of the eleven parcels proposed for acquisition (700-710 East Taylor Street, 701-735 Belli Drive, 765-807 Belli Drive, 845 Belli Drive, 865 Belli Drive, and 885 Belli Drive) contribute to the NRHP-eligible Belli Addition Historic District.

The demolition of the homes on these parcels would result in an adverse effect to the historic district by diminishing the number of contributing properties in the district, by altering its southern boundary along Belli Drive, and by eliminating the only multi-story brick multi-unit apartment buildings in the district.

VA concluded that the reduction of Kirman Avenue to one lane would have a visual impact to the adjacent area, but would not have an adverse effect on historic properties if the prism and corridor of the street is maintained.

In consultation with SHPO, VA would develop a plan to mitigate cultural resource effects associated with the Preferred Action Alternative. The mitigation measures would be formalized in a Memorandum of Agreement (MOA) between VA and SHPO and other interested parties. Anticipated mitigation measures, based on preliminary VA discussions with SHPO, are described in Section 3.4.5.

Compliance with the terms of the MOA would satisfy VA's requirements under Section 106 of the NHPA and would mitigate the adverse effects to cultural resources of the Preferred Action Alternative.

3.4.4 Effects of the No Action Alternative

Under the No Action Alternative, no activities by VA would occur and there would be no cultural resources impacts.

3.4.5 Mitigation/Management Measures

The Preferred Action Alternative could cause adverse effects to historic resources. VA has actively engaged with the SHPO and through this consultation, has developed preliminary plans to mitigate the adverse effects to less-than-significant levels. These preliminary plans include:

- Placing an interactive display within the hospital. This would serve as a demonstration for the local community of the historic value of the neighborhood architecture and the historic value of the VASNHC to the development of the City of Reno. The display would also demonstrate the historic significance of the neighborhoods surrounding the VASNHCS, with special highlights regarding the architectural styles that contribute to their historic significance.

- An addition of a link from the VASNHCS website to a website dedicated to the history of the surrounding neighborhoods that includes both written and photographic history of the surrounding area.

- Inclusion of historic photographs of the surrounding neighborhoods within public spaces in the hospital honoring the heritage of the area.

If the Preferred Action Alternative is implemented and Site parcels containing structures contributing to the Belli Addition Historic District are acquired, VA would:

- Enter into a formal MOA with the SHPO and other interested parties that defines an appropriate plan to mitigate the adverse cultural resources effects.

- Implement the mitigation plan defined in the MOA.

In addition, implementing BMPs to reduce impacts during construction would further minimize potential impacts to local cultural resources. All contractors involved in site preparation and ground disturbing construction would be advised that all work must stop immediately in the event that archaeological features, artifacts, or remains are discovered during project construction. The construction contractor would immediately cease work until VA, a qualified archaeologist and the SHPO are contacted to properly identify and appropriately treat discovered items in accordance with the MOA and applicable State and Federal law(s).

3.5 Geology and Soils

According to the Physiographic Regions of the US, dated 2003 and published by the United States Geological Survey (USGS), City of Reno is located near the western boundary of the Basin and Range physiographic province and is characterized by Cenozoic continental deposits, early and late Cenozoic volcanic rocks, and Mesozoic granite rocks. The area is located in the Washoe Valley, resulting from enormous volumes of material (i.e., sediment) that were eroded from the surrounding mountains beginning in middle Miocene time period (about 17 million years before present), including an average sediment thickness of about 2,000 feet.

The Basin and Range physiographic province is characterized by lithospheric (crust and upper mantle) extension and thinning. Data suggest that a discontinuity in the earth's crust and upper mantle associated with the San Andreas Fault caused vertical thinning and horizontal extension

in the Basin and Range physiographic province (Earth System History, S.M. Stanley, 2005). As a result, the Reno area is proximal to several fault lines and is classified as seismically active. Fault lines in the region include the Sierra Nevada Frontal fault system and the Mount Rose, the Spanish Springs Valley, the Peavine Peak fault zones, located at least three miles from the VASNHCS campus. However, these fault zones are not known to be currently active and the VASNHCS campus area has not been designated as an earthquake fault zone.

The Reno, Nevada USGS Topographic Quadrangle (dated 2015) indicates that surficial topography at the VASNHCS campus area [elevation approximately 4,460 feet above mean sea level (amsl)] gently slopes down to the southeast. The nearest surface water body is the Truckee River, located approximately 4,300 feet north of the campus.

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, the 11 Site parcels contain two soil types identified as Washoe gravelly sandy loam, 0 to 4 percent slopes (majority of site) and Oest bouldery sandy loam, 2 to 8 percent slopes (northwest corner of site). These soils are characterized as well drained soils with moderately high to high permeability and water table greater than 80 inches below ground surface (bgs). Site soils are shown on Figure 9.

According to a water well log for 801 Belli Drive, provided by the Washoe County Health District (WCHD), the soils in the site vicinity consist of sandy clay and rock from the ground surface to at least 272 feet bgs and intervals of sand and gravel and sandy clay from 272 to 320 feet bgs.

Previous subsurface explorations in the vicinity of the VASNHCS campus identified medium dense to very dense sandy soil with gravel, cobbles, and boulders (Kleinfelder, 2014).

3.5.1 Prime and Unique Farmland Soils

Prime and Unique Farmlands are regulated in accordance with the Farmland Protection Policy Act (FPPA) (7 USC 4201, *et seq*.) to ensure preservation of agricultural lands that are of statewide or local importance. Soils designated as prime farmland are capable of producing high yields of various crops when managed using modern farming methods. Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion. Unique farmlands are also capable of sustaining high crop yields and have special combinations of favorable soil and climate characteristics that support specific high-value foods or crops. According to the USDA NRCS Web Soil Survey, the soils on the 11 Site parcels are classified as farmland of statewide importance.

3.5.2 Soil Erosion and Stormwater Management

The City of Reno has been granted a National Pollutant Discharge Elimination System (NPDES) municipal separate storm sewer system (MS4) permit which authorizes the discharge of municipal storm water runoff associated with construction and operation of public and private projects to the receiving waters of the Truckee River. It also requires the continued administration, implementation, and enforcement of a Storm Water Management Plan (SWMP) to mitigate pollution in stormwater runoff within the Truckee Meadows MS4 permit area. NDEP has issued a General Permit for Stormwater Discharges Associated with Construction Activity (NVR100000) which details specific requirements for owners and operators of applicable private

and public construction sites to control erosion, sediment and waste discharges to the municipal storm drain system. Construction projects that propose to disturb more than one acre of the ground surface must obtain an NPDES permit and comply with the NPDES requirements. The NPDES permitting process is administered by the Truckee Meadows Stormwater Quality Management Program (TMSQMP) and includes specific details regarding construction site BMPs, structural controls, and low impact development (LID) practices.

3.5.3 Effects of the Preferred Action Alternative

No significant changes to topography or drainage at the Site parcels would be expected as a result of the Proposed Action. The parking lots would be designed in concert with the current topography (nearly level) and drainage. Paved areas would be designed to drain to the municipal or onsite stormwater system.

Soils on the Site parcels are classified as farmland of statewide importance. Based on the current use of the Site parcels as fully developed residential properties within an urban area of the City of Reno, the loss of prime farmland soils at the site is considered to be a less–than-significant. The Site parcels are located in a designated urban area and are exempt from the FPPA requirements.

Less-than-significant impacts to geology are anticipated. Based on currently available data, no active significant faults are known to occur in the VASNHCS campus area and the area has not been designated as an earthquake fault zone. As such, no impacts associated with seismic hazards are identified. No significant impacts to mineral resources are anticipated, as the Proposed Action would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, state, national, or global basis.

During the construction of the proposed parking lots, less-than-significant, direct and indirect, short-term soil erosion and sedimentation impacts would be possible. Demolition and construction activities would remove current paved and vegetative cover, disturb the soil surface, and compact the soil. The soil would then be susceptible to erosion by wind and surface runoff. Exposure of the soils during construction has the potential to result in off-site discharges of sediment-laden runoff and increased sedimentation in the municipal stormwater system. However, such potential adverse erosion and sedimentation effects would be prevented through utilization of appropriate BMPs and adherence to the terms of the NPDES General Permit for Construction Activity permit.

Once construction is complete, no long-term erosion and sedimentation impacts would be anticipated due to the nature of the Proposed Action. No long-term soil erosion impacts would occur as a result of increased impervious surfaces onsite; these effects would be mitigated by including appropriate stormwater system management as part of final parking lot design.

3.5.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA would occur. No impacts to soils, topography, or geology by VA would occur.

3.5.5 Mitigation/Management Measures

No project-specific mitigation measures are required. Implementing BMPs to reduce erosion and sedimentation impacts during construction would further minimize the potential impacts on local soils and water quality.

VA would design site improvements in accordance with the requirements of EO 13514/E1SA Section 438 with respect to stormwater runoff quantity and characteristics.

VA would develop, submit to the TMSQMP, and have approved, a NPDES General Permit for Construction Activity for the construction of the proposed parking lots. The NPDES permit would require storm water runoff and erosion management through structural controls, LID practices, earth berms, detention basins, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the following as appropriate and necessary to protect surface water quality, as part of NPDES permit:

- Implement sediment and erosion control measures as required by the NPDES permit.
- Install and monitor erosion-prevention measures, such as silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil; and seed/re-vegetate areas temporarily cleared of vegetation.
- Retain on-site vegetation to the maximum extent possible.
- Plant and maintain soil-stabilizing vegetation on disturbed areas.
- Use native vegetation to re-vegetate disturbed soils.

The construction contractor would obtain all required permits before any proposed construction activities commence and would adhere to permit conditions during all onsite construction activities.

If measures in the NPDES permit are approved and correctly utilized for site development, direct soil erosion and resulting indirect sedimentation impacts would be minimized to less-than-significant levels. Successful implementation of these measures would ensure that the Proposed Action is in compliance with State and Federal water quality standards and minimizes both the short- and long-term potential for erosion and sedimentation.

Implementation of these measures would maintain identified impacts at less-than-significant levels by properly controlling and limiting soil erosion and sedimentation impacts.

FIGURE 9
SOILS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS PARKING LOTS AND KIRMAN AVENUE MODIFICATION
RENO, NEVADA

PREPARED FOR

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3.6 Hydrology and Water Quality

3.6.1 Surface Waters

The VASNHCS campus is located in the Truckee River Watershed. Stormwater runoff from the Site parcels infiltrates into onsite soils or discharges into the municipal storm sewer system. The nearest surface water body to the Site parcels is the Truckee River, located approximately 4,300 feet north. No surface water features are located at the VASHNCS campus, the Site parcels, or the surrounding properties.

3.6.2 Groundwater

According to the Groundwater Atlas of the United States, the VASNHCS campus is not underlain by significant usable aquifers. However, Basin-Fill aquifers are regionally located around Reno and are characterized by unconsolidated sand and gravel of Quaternary and Tertiary age. The water well log for 801 Belli Drive, provided by the WCHD, indicated that the well is screened from 271 to 320 feet bgs, and the static groundwater level was 270 feet bgs. According to a NDEP Complaint/Spill Report Form for 805 Belli Drive, dated January 14, 2002, shallow groundwater in the vicinity of the Site parcels is anticipated to be between 20 and 21 feet bgs.

3.6.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative would not result in significant adverse impacts to surface water resources, provided the BMPs described in Sections 3.5.5 and 3.6.5 are implemented. These BMPs would control construction-related impacts of soil erosion and sedimentation, and would provide a proper onsite storm water management system. These practices would prevent adverse impacts to surface waters near the Site parcels.

The proposed parking lots would have less-than-significant impacts to groundwater quality. It is not anticipated that groundwater would be encountered during the construction activities or that excavation dewatering would be required. No groundwater use is planned as part of the Preferred Action Alternative.

3.6.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA would occur. No impacts to water resources by VA would occur.

3.6.5 Mitigation/Management Measures

No mitigation measures are required. To minimize potential adverse impacts to surface waters in the site area, VA would implement the following BMPs:

- VA would implement BMPs to reduce erosion and sedimentation impacts during construction as described in Section 3.5.4.

- VA would ensure that the parking lot design includes sufficient stormwater management so as not to adversely affect the flood elevations or water quantity/quality of downstream receiving waters. Post-project hydrology shall

replicate pre-project hydrology through the appropriate engineering design and implementation of a stormwater management system at the site.

- Site improvements would be designed in accordance with the requirements of EO 13514/EISA Section 438 with respect to stormwater runoff and characteristics.

Implementation of these BMPs would ensure identified water resources impacts are maintained as less-than-significant levels.

3.7 Wildlife and Habitat

3.7.1 Vegetation and Wildlife

The Site parcels are currently occupied by residential structures and associated landscaping and pavement. No natural vegetation communities supportive of wildlife species are present on the Site parcels. The lands immediately adjacent to this Site parcels are generally developed with residential and institutional land uses. Vegetative communities are not likely to support wildlife; the surrounding lands are likely to support minimal wildlife species associated with urban areas in the City of Reno.

Vegetation and landscaping are managed by the City of Reno through the Chapter 8.32 (Trees and Shrubs), Chapter 18.12 (General Development and Design Standards), and Chapter 18.08 (Zoning) of the RLDC.

3.7.2 Threatened and Endangered Species

As part of the preparation of this EA, the US Fish and Wildlife Service (USFWS) Reno Fish and Wildlife Office (RFWO), NDEP, and Nevada Department of Conservation and Natural Resources (NDCNR), Natural Heritage Program (NHP) were contacted to identify any potential for presence of State or Federally-listed threatened or endangered species on or in the vicinity of the VASNHCS campus.

According to the USFWS RFWO, information pertaining to threatened, endangered, and candidate species and critical habitat can be obtained from the USFWS Information, Planning, and Conservation (IPaC) System internet website. According to the USFWS IPaC System, Endangered Species Program database, one Federally-listed endangered fish species, one Federally-listed endangered plant species, and one Federally-listed endangered insect species are known to occur within Washoe County. Two Federally-listed threatened fish species and one Federally-listed threatened plant species are also known to occur within Washoe County. In addition, two Federally-listed candidate plant species and one Federally-listed candidate bird species are known to occur within Washoe County, Nevada. Based on the lack of natural habitat in the VASNHCS campus area, none of the identified species are likely to be present.

The NDCNR NHP stated that there are no recorded “at risk” species in the vicinity of the VASNHCS campus. However, the NDCNR NHP stated that there is potential habitat for the Tricolored Blackbird, a species classified as Critically Imperiled, and the Spotted Bat, a species classified as a Nevada Bureau of Land Management Sensitive Species. The NDCNR recommended that VA consult with the Nevada Department of Wildlife (NDOW) for additional information.

According to the NDOW internet website, Tricolored Blackbird habitats include annual grasslands, wet and dry vernal pools, and other seasonal wetlands. Spotted Bat habitats include wetlands, riparian, rock, cliff, desert, shrubland, grassland, or woodland habitats usually near a permanent water source. They roost in caves and rock crevices mainly, but may also occasionally use mines, caves, and buildings as roost sites. Based on the habitat requirements for these species and the developed nature of the VASNHCS campus and surrounding area, it is unlikely that these species are present.

3.7.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative would have less-than-significant adverse effects on biological resources. The proposed construction activities would include the removal of landscaped, vegetated areas; however, no special status species or their critical habitats are anticipated to occur in these areas.

Based on the habitat requirements of the Federal and State listed special status species for Washoe County and the highly developed, urban nature of the VASNHCS campus and surrounding area, these species are not likely to be present in the area or affected by the Proposed Action.

3.7.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA would occur. No impacts to biological resources would occur.

3.7.5 Mitigation/Management Measures

No mitigation measures are required. VA would implement the following BMPs to reduce biological resources impacts during construction and operation:

- Native species should be used to the extent practicable when re-vegetating land disturbed by facility construction to avoid the potential introduction of non-native or invasive species.

- VA would comply with, to the extent practicable, Chapter 8.32 (Trees and Shrubs), Chapter 18.12 (General Development and Design Standards), and Chapter 18.08 (Zoning) of the RLDC.

3.8 Noise

The existing noise environment around the Site parcels is dominated by vehicle traffic along Kirman Avenue and East Taylor Street, and to a lesser degree, Belli Drive, Wilkinson Avenue, Burns Street, and Balzar Circle. In addition, the operations and equipment associated with the VASNHCS play a noticeable role in the noise environment in the vicinity of the Site parcels. No other notable noise-generating sources are present in the immediate vicinity of the Site parcels. As such, the noise environment of the area can be characterized as that typical of a primarily residential, urban area.

The City of Reno maintains Ordinance 6286 (Noise Ordinance). The ordinance prohibits any continuous noise above 65 decibels (dB). The ordinance also limits times of construction activities to between 6:00 am and 7:00 pm.

3.8.1 Sensitive Receptors

Sensitive noise receptors in the ROI include those identified in Section 3.3.2. These primarily include the residential areas surrounding the Site parcels. In addition, Veterans Memorial Elementary School is located approximately 600 feet south-southwest of the Site parcels and Bailey Charter Elementary School is located approximately 900 feet southeast of the Site parcels. No other schools are located within 1,000 feet of the Site parcels and no hospitals other than the VASNHCS are located within 1,000 feet of the Site parcels.

3.8.2 Effects of the Preferred Action Alternative

The Preferred Action Alternative would have short-term, less-than-significant impacts to the existing noise environment due to the demolition and construction activities. Noise generating sources during demolition and construction activities would be associated primarily with standard construction equipment and construction equipment transportation. These increased noise levels could directly affect the neighboring area, including the residential properties located in the vicinity of the Site parcels.

Demolition and construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Demolition and construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Demolition and construction activities are expected to be typical of other similar construction projects and would include mobilization, demolition, site preparation, excavation, utility development, heavy equipment movement, and paving roadways and parking areas. The most prevalent noise source at typical construction sites is the internal combustion engine. General construction equipment using engines includes, but is not limited to: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; man lifts; forklifts; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA (decibels, A-weighted scale) would occur on the active construction site, decreasing with distance from the construction areas. Table 1 presents peak noise levels that could be expected from a range of construction equipment during proposed construction activities.

Generally speaking, peak noise levels within 50 feet of active demolition and construction areas and material transportation routes would most likely be considered “striking” or “very loud”, comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud - approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25 mile, demolition and construction noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times.

Combined peak noise levels, or worst-case noise levels when several loud pieces of equipment are used in a small area at the same time as described in Table 1, are expected to occur rarely, if ever, during the project. However, under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the demolition and construction area, depending on equipment being used.

Although noise levels would be quite loud in the immediate area, the intermittent nature of peak demolition and construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Demolition and construction workers would follow standard Federal Occupational Safety and Health Administration (OSHA) requirements to prevent hearing damage.

Areas that could be most affected by noise from demolition and construction include those closest to the construction footprint, including the surrounding residential neighborhoods and the adjoining VASNHCS. Veterans Memorial Elementary School, located approximately 600 feet south-southwest of the southern Site parcel and Bailey Charter Elementary School, located approximately 900 feet southeast of the central Site parcels would be less affected by noise from the Proposed Action. Indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels.

Indirect impacts during demolition and construction include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes) transit to and from the site. Because trucks are present during most phases of demolition and construction and would enter and exit the Site area via local thoroughfares, truck noises tend to impact more people over a wider area. For this Proposed Action, persons in the residential areas near the Site parcels would experience temporary increases in truck traffic noise during day-time hours. These effects are not considered significant because they would be temporary, intermittent, and similar to existing traffic noise levels in the area.

Table 1. Peak Noise Levels Expected from Typical Construction Equipment

Source	Peak Noise Level (dBA, attenuated)							
	Distance from Source (feet)							
	0	50	100	200	400	1,000	1,700	2,500
Heavy Truck	95	84-89	78-93	72-77	66-71	58-63	54-59	50-55
Dump Truck	108	88	82	76	70	62	58	54
Concrete Mixer	108	85	79	73	67	59	55	51
Jack-hammer	108	88	82	76	70	62	58	54
Scraper	93	80-89	74-82	68-77	60-71	54-63	50-59	46-55
Bulldozer	107	87-102	81-96	75-90	69-84	61-76	57-72	53-68
Generator	96	76	70	64	58	50	46	42
Crane	104	75-88	69-82	63-76	55-70	49-62	45-48	41-54
Loader	104	73-86	67-80	61-74	55-68	47-60	43-56	39-52
Grader	108	88-91	82-85	76-79	70-73	62-65	58-61	54-57
Pile driver	105	95	89	83	77	69	65	61
Forklift	100	95	89	83	77	69	65	61

Worst-Case Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)					
	Distance from Source (feet)				
Combined Peak Noise Level	50	100	200	¼ Mile	½ Mile
	103	97	91	74	68

Source: Tipler 1976

Operational activities associated with the Proposed Action would include vehicle traffic to and from the parking lots. This traffic would not produce excessive noise; noise levels would be consistent with existing noise levels in the area. Vehicles that would use the parking lots currently park on the streets in the residential neighborhoods around the VASNHCS campus. As such, the parking lots would not produce a significant adverse noise impact on surrounding land uses.

3.8.3 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment surrounding the Site parcels would not change. The noise environment of the Site parcels would not be altered by activities of VA.

3.8.4 Mitigation/Management Measures

No project-specific mitigation measures are required. Implementing BMPs to reduce noise generated during demolition and construction would further minimize the potential impacts on the local noise environment. To minimize the potential for adverse, short-term noise impacts, the contractor would implement the following typical noise control BMPs, as applicable. These measures would be briefed to the contractor at a kick-off meeting and daily at tailgate safety meetings. The onsite construction manager would be responsible to immediately address noise issues, if they arise. These BMPs include:

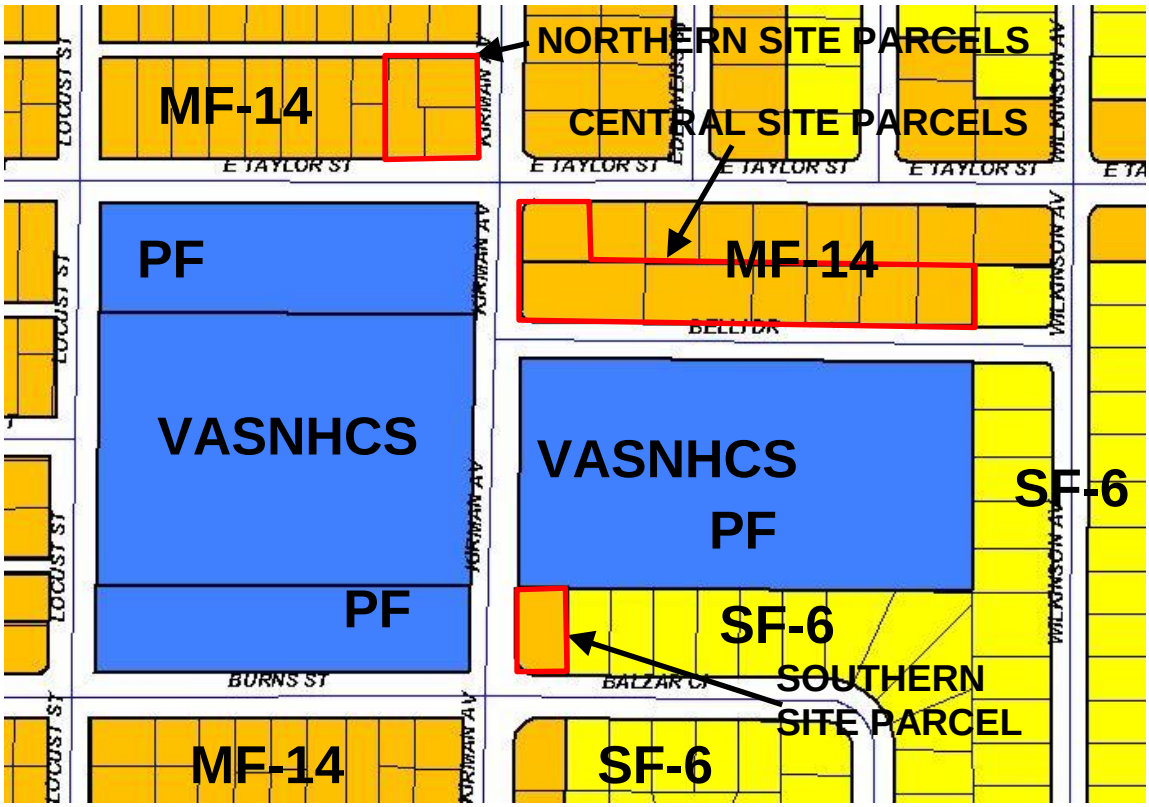
- Comply with the City of Reno Noise Ordinance, to the extent practicable.
- Make best efforts to conduct demolition and construction activities between the hours of 6:00 am and 7:00 pm, Monday through Saturday.
- Limit construction activities on Sundays.
- Coordinate proposed construction activities in advance with adjacent sensitive receptors. Let the local residents know what operations would be occurring at what times, including when they would start and when they would finish each day. Post signage, updated daily, at the entry points of the site providing current construction information, including schedule and activity.
- Locate stationary equipment as far away from sensitive receptors as possible.
- Select material transportation routes as far away from sensitive receptors as possible.
- Shut down noise-generating heavy equipment when it is not needed.
- Maintain noisy equipment per manufacturer's recommendations.
- Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.).

Implementation of these BMPs would reduce the potential for short-term adverse noise impacts to acceptable levels, notably for nearby sensitive receptors (nearby residents and schools).

3.9 Land Use

The VASNHCS campus is located within an urban, predominantly residential area. Two of the 11 Site parcels (885 Belli Drive and 703 Balzar Circle) are occupied by single-family residences. The remaining site parcels are occupied by multi-family rental buildings including five duplexes, one triplex, one quadplex, and four small apartment buildings. Properties surrounding the Site parcels are also residential.

The City of Reno, Building, Planning, and Engineering Department (RBPED) is responsible for long-range planning and zoning. According to the RBPED, all of the Site parcels are currently zoned Multi-Family Residential, 14 units per acre (MF-14). The VASNHCS campus is located on land zoned Public Facility (PF). The properties surrounding the VASNHCS campus and Site parcels are zoned MF-14 and Single-Family Residential, 6,000 square feet (SF-6). The proposed use of the Site parcels for surface parking is considered a "permitted use by right" according to the RLDC, Zoning. Current zoning designations for the Site parcels and the surrounding area are depicted on Figure 10.



PF – Public Facility
MF-14 – Multi-family Residential, 14 Units Per Acre
SF-6 – Single-family Residential, 6,000 Square Feet

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FIGURE 10
ZONING MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS PARKING LOTS AND KIRMAN AVENUE MODIFICATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO.
12181.02

TTL associates inc
Environmental, Geotechnical Engineering & Testing

3.9.1 Effects of the Preferred Action Alternative

Implementation of the Preferred Action Alternative would result in less-than-significant, long-term land use effects within the vicinity of the Site parcels. Although, as a Federal agency, VA is not subject to local zoning regulations or restrictions, the proposed use of the Site parcels would be compatible with local zoning and land use. The parking lots would be developed in consonance with local plans. The parking lots would be designed and constructed in accordance with local building codes to ensure they are consistent with other area developments. No adverse on-site building function or architecture impacts are anticipated.

3.9.2 Effects of the No Action Alternative

Under the No Action Alternative, no land use impacts due to VA's Proposed Action would occur.

3.9.3 Mitigation/Management Measures

No project-specific mitigation or management measures are required.

3.10 Wetlands, Floodplains, and Coastal Zone Management

3.10.1 Wetlands

This section discusses wetlands at or near the Site parcels and surface waters (streams) as they pertain to wetlands. Additional information regarding surface waters is provided in Section 3.6.

No surface water features (or wetlands) were identified on or adjacent to the Site parcels during the site reconnaissance. The USFWS Online Wetland Mapper indicated that no mapped wetlands are located on or near the Site parcels.

3.10.2 Floodplains

According to available FEMA floodplain mapping, the Site parcels and surrounding areas are not located in the 100-year or 500-year floodplain (FEMA Flood Insurance Rate Map No. 32031C3043G, dated March 16, 2009).

3.10.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA of 1990, as amended (16 USC 1451 *et seq.*) encourages States to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats. The State of Nevada does not participate in the National Coastal Zone Management Program (CZMP). The Site parcels are not included in a designated coastal zone.

3.10.4 Effects of the Preferred Action Alternative

No wetlands were identified on or near the Site parcels. In addition, the Site parcels are not included in the 100-year or 500-year floodplain or a designated coastal zone. No impacts to

wetlands, floodplains, or coastal zones would occur with the implementation of the Preferred Action Alternative.

3.10.5 Effects of the No Action Alternative

No impacts to wetland, floodplains, or coastal zones would occur.

3.10.6 Mitigation/Management Measures

No mitigation or management measures are required.

3.11 Socioeconomics

The following subsections identify and describe the socioeconomic environment of the City of Reno, Washoe County and the State of Nevada. Presented data provide an understanding of the socioeconomic factors that have developed the area. Socioeconomic areas of discussion include the local demographics of the area, regional and local economy, local housing, and local recreation activities. Data used in preparing this section were collected from the 2010 Census of Population and Housing (US Census Bureau), subsequent US Census Bureau data, and the US Department of Commerce Bureau of Economic Analysis (BEA).

3.11.1 Demographics

The City of Reno's estimated population in 2014 was 233,294 citizens. Washoe County's estimated population in 2014 was 440,078 citizens. The estimated population total for Nevada was 2,839,099 residents in 2014. Population totals for the City of Reno, Washoe County, and Nevada have all considerably increased from 1990 to 2014 (see Table 2).

Table 2. Population Totals for the City of Reno, Washoe County, and Nevada

Area	1990	2000	2013/2014 (estimates)
Nevada	1,201,833	1,998,257	2,839,099
Washoe County	254,667	339,486	440,078
City of Reno	134,747	183,973	233,294

Sources: US Census Bureau, 2010 Census and 2013/2014 Estimates, Profile of General Demographic Characteristics.

Baseline information identified that the City of Reno and Washoe County have similar or lower minority populations than the State of Nevada as a whole (Table 3).

Table 3. Regional Population by Race and Ethnicity							
Area	All Individuals	White (%)	African-American (%)	American Indian and Alaska Native (%)	Asian or Pacific Islander (%)	Other Race (%)	Hispanic or Latino* (%)
Nevada	2,839,099	76.7	9.0	1.6	8.8	3.9	27.5
Washoe County	440,078	85.7	2.6	2.1	6.4	3.2	23.3
City of Reno	233,294	74.2	2.9	1.3	7.0	4.2	24.3
Note: People of Hispanic or Latino origin may be of any race. Note: The six percentages reported by the US Census Bureau for each geographic region may total more than 100% because individuals may report more than one race. Source: US Census Bureau, 2009-2013 Profile of General Demographic Characteristics.							

The City of Reno, Washoe County, and the State of Nevada have similar educational attainment levels. Educational attainment data are presented in Table 4.

Table 4. Educational Attainment: City of Reno, Washoe County, and Nevada			
Educational Attainment	City of Reno	Washoe County (%)	Nevada (%)
High school graduate (incl. equivalency)	85.7	86.9	84.6
Bachelor's degree or higher	28.9	27.3	22.4
Source: US Census Bureau, 2009-2013 Profile of General Demographic Characteristics.			

3.11.2 Employment and Income

The Reno – Sparks, Nevada metropolitan area employment is distributed amongst the following types of occupations (greatest number of jobs to least number of jobs): arts, entertainment, and recreation; accommodation and food services; healthcare; education services; construction; and professional, scientific, and technical services (Bureau of Labor Statistics, January 2015).

The unemployment rates for the City of Reno and the State of Nevada were similar in February 2015 (7.1%). Washoe County has a higher unemployment rate (12.4%) than the City of Reno and the State of Nevada (see Table 5). Median household incomes were slightly lower in the City of Reno than Washoe County and the State of Nevada. The percent of population below the poverty level was slightly higher in the City of Reno than Washoe County and the State of Nevada.

Table 5. Regional Income					
Area	Number of Households	Median Household Income ($)	Per Capita Income ($)	Population Below Poverty Level (%)	Unemployment Rate (%) February 2015
Nevada	999,016	52,800	26,589	15.0	7.1
Washoe County	163,198	53,040	28,670	15.1	12.4
City of Reno	90,071	46,770	26,472	18.6	7.1
Source: US Census Bureau, 2009-2013 Profile of General Demographic Characteristics.					

3.11.3 Commuting Patterns

Residents of the City of Reno are largely dependent on personal automobiles for transportation to and from work. Other methods of transit include public transportation (buses), carpooling, and walking. The average commuting times in the greater Reno area was approximately 19 minutes in 2013. Public transportation for the City of Reno is provided by the Regional Transportation Commission of Washoe County (RTC). The nearest bus route to the VASNHCS is Bus Route 13, which runs north along Locust Street and south along Kirman Avenue between the eastern and western portions of the VASNHCS campus and includes stops at the VASNHCS.

3.11.4 Housing

Rates of owner-occupied housing in the City of Reno are lower than Washoe County and the State of Nevada as a whole. This is likely reflective of the more urban character of Reno relative to the rest of the county and state with an increase in renter-occupied housing. The median values of housing in the City of Reno and Washoe County are higher than the State of Nevada as a whole (see Table 6).

Table 6. Regional Housing Characteristics						
Area	Total Housing Units	Occupied (%)	Owner-Occupied (%)	Median Value ($)	Renter-Occupied (%)	Median Contract Rent ($)
Nevada	1,186,879	N/A	56.7	169,100	N/A	N/A
Washoe County	185,305	N/A	58.0	203,300	N/A	N/A
City of Reno	102,582	N/A	47.4	202,100	N/A	N/A
Source: US Census Bureau, 2009-2013 Profile of General Demographic Characteristics.						

3.11.5 Protection of Children

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, *Protection of Children From Environmental Health Risks and Safety Risks*, was

introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that Federal agencies' policies, programs, activities, and standards address environmental risks and safety risks to children. This section identifies the distribution of children and locations where numbers of children may be proportionately high (e.g., schools, childcare centers, family housing, etc.) in areas potentially affected by the Proposed Action.

Children are present in the residential neighborhoods surrounding the VASNHCS campus. The percentage of the population under age 18 is similar within the City of Reno, Washoe County, and the rest of Nevada (see Table 7).

Table 7. Total Population Versus Population Under Age 18

Area	Total Population	Population Under 18	
		Number	Percent
Nevada	2,839,099	672,866	23.7
Washoe County	440,078	100,338	22.8
City of Reno	233,294	53,191	22.8

Source: US Census Bureau, 2009-2013 Profile of General Demographic Characteristics.

3.11.6 Effects of the Preferred Action Alternative

Acquisition of the Site parcels is not anticipated to have significant adverse socioeconomic effects as VA would acquire parcels from willing landowners through amicable negotiation. VA would purchase the parcels at their fair market value, as determined by a third party licensed, independent appraiser. In addition, the Proposed Action is subject to the federal Uniform Relocation Assistance and Real Property Acquisition Policy Act (URA), which was promulgated to ensure the uniform and equitable treatment of displaced people from their residences as a result of the federal acquisition of private property. VA would develop a Relocation Plan specific to the Preferred Action Alternative to identify potential problems and associated solutions for displaced residents, residential tenants, and/or landlords as a result of the implementation of the Proposed Action. For residents and residential tenants, VA would offer relocation advisory assistance, pay for moving expenses, and pay for comparable replacement housing that is decent, safe and sanitary (DSS). A relocation analysis prepared on behalf of VA indicated that there are sufficient available properties within the immediate area for residents and residential tenants to relocate and that there are numerous residential properties available for rent or sale in other parts of the City of Reno. Through this acquisition process and the relocation assistance, VA would maintain socioeconomic impacts to property owners and displaced residents and residential tenants at less-than-significant levels.

Construction of the proposed new parking lots would potentially provide additional temporary construction jobs in the private sector, thus providing short-term socioeconomic benefit to the area. The operation of the parking lots would not provide significant long-term employment or socioeconomic benefit for the area. The Proposed Action would result in significant long-term positive socioeconomic impacts by providing additional parking for the VASNHCS that would allow VA to provide adequate healthcare facilities and services to regional U.S. Veterans and adequate parking for VASHCS staff.

The proposed modifications of the section of Kirman Avenue that bisects the eastern and western portions of the VASNHCS campus would moderate and control the flow of traffic in this area and would improve the safety of VASNHCS patients, visitors, and staff crossing from the parking area to the medical buildings.

No significant adverse health or safety risks to children are anticipated to result from construction or operation of the new parking lots. Construction areas would be secured to prevent unauthorized access by children from the nearby residential areas. The construction contractor would limit and control construction dust and noise as discussed in Sections 3.3 and 3.8, thereby minimizing adverse effects to children in the area.

3.11.7 Effects of the No Action Alternative

The No Action Alternative would result in no construction and no increased short-term or long-term economic benefit due to VA's action.

Most importantly, the No Action Alternative would not enable VA to provide adequate parking and safe access to the VASNHCS medical facilities for patients, staff and visitors.

3.11.8 Mitigation/Management Measures

No project-specific mitigation measures are required as VA would seek to purchase the Site parcels from willing landowners through amicable negotiation. To minimize socioeconomic effects associated with relocation, VA would implement the following management measures:

- VA would comply with the requirements of the URA to ensure the uniform and equitable treatment of displaced people from their residences. VA would develop a Relocation Plan specific to the Preferred Action Alternative to identify potential problems and associated solutions for displaced residents, residential tenants, and/or landlords as a result of the implementation of the Proposed Action.

- VA would offer displaced residents and residential tenants relocation advisory assistance, pay for moving expenses, and pay for comparable replacement housing that is decent, safe and sanitary (DSS).

3.12 Community Services

The Site parcels are located within the Washoe County School District (WCSD). This school district includes 61 elementary schools, 14 middle schools, 17 high schools, and one online school (WCSD 2015). Schools in the vicinity of the VASNHCS campus include Veterans Memorial Elementary School (1200 Locust Street), located approximately 600 feet south-southwest of the southern Site parcel; Bailey Charter Elementary School (1090 Bresson Avenue), located approximately 900 feet southeast of the central Site parcels; Vaughn Middle School (1200 Bresson Avenue), located approximately 1,100 feet southeast of the central Site parcels; and Booth Elementary School (425 East 9th Street), located approximately 1,150 feet northeast of the central Site parcels. No other schools are located with 2,000 feet of the Site parcels (Google Earth 2015).

The City of Reno Police and Fire Departments provide police and fire protection and emergency medical services to the VASNHCS campus area.

The City of Reno and the Nevada Department of Transportation (NDOT) provide maintenance to primary roads and bridges in the vicinity of the VASNHCS campus.

There are no developed recreational facilities in the immediate vicinity of the VASNHCS campus.

The VASNHCS is located adjoining to the south and west of the Site parcels. In addition, the Renown Regional Medical Center (1155 Mill Street) is located approximately 0.5-mile northeast of the Site parcels, West Hills Hospital (1240 E. Ninth Street) is located approximately 1.3 miles north of the Site parcels, and St. Mary's Regional Medical Center (235 W. Sixth Street) is located approximately 1.4 miles northwest of the Site parcels. No other hospitals are located within 5 miles of the VASNHCS campus.

3.12.1 Effects of the Preferred Action Alternative

No significant additional load is expected to be placed on the fire or police departments as the result of implementing the Proposed Action. Use of other public or community services as a result of the proposed parking lots is not expected. As such, the Proposed Action is expected to have a negligible impact on local public services. The modification of Kirman Avenue would maintain through traffic, as such, it is not anticipated that fire or police services would be significantly impacted.

3.12.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA would occur and no impacts to community services would be anticipated.

3.12.3 Mitigation/Management Measures

No project-specific mitigation or management measures are required.

3.13 Solid and Hazardous Materials

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (i.e., through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances are identified through a number of Federal laws and regulations. The most comprehensive list is contained in 40 CFR 302, and identifies quantities of these substances, when released to the environment, that require notification to a Federal agency. Hazardous wastes, defined in 40 CFR 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (e.g., solids or liquids) not otherwise excluded by 40 CFR 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR 261. Petroleum products are specifically exempted from 40 CFR 302, but some are also generally considered hazardous substances due to their physical characteristics (i.e., especially fuel products), and their ability to impair natural resources.

TTL completed a Phase I Environmental Site Assessment (Phase I ESA) of the 11 Site parcels in May 2015, including site reconnaissance from public areas, a review of historic information, and a review of local, State and Federal environmental regulatory information for the Site parcels and surrounding area. The Site parcels are currently occupied by two single-family

residences (885 Belli Drive and 703 Balzar Circle), five duplex residences (691/693, 697/699, and 700-710 East Taylor Street; 825/835 Kirman Avenue; and 805/807 Belli Drive), one triplex residence (701/707/715 Belli Drive), one quadplex residence (825/827/829/831 Belli Drive), four small apartment buildings (735, 765, 845 and 865 Belli Drive), one automobile garage with apartments (801 Belli Drive), and garages and sheds associated with the residences.

The northern portion of the Site includes three parcels at the northwest corner of Kirman Avenue and East Taylor Street. These parcels were unimproved land from at least 1939 to 1948. Since 1948, the northern Site parcels have been occupied by duplex residential structures, including 691/693 East Taylor Street (constructed in 1953), 697/699 East Taylor Street (constructed in 1954), and 825/835 Kirman Avenue (constructed in approximately 1948). In addition, two garages associated with 691/693 East Taylor Street and 825/835 Kirman Avenue have been present since at least 1953.

The central portion of the Site includes seven parcels east of Kirman Avenue located between Belli Drive and East Taylor Street. The central Site parcels were unimproved land from at least 1939 to approximately 1952. Since 1952, these parcels have been occupied by nine single and multi-family residential structures, including 700-710 East Taylor Street (constructed in 1953), 701-715 Belli Drive (constructed in 1955), 735 Belli Drive (constructed in 1952), 765 Belli Drive (constructed in 1952), 801-807 Belli Drive (constructed in 1955), 825-831 Belli Drive (constructed in 1972), 845 Belli Drive (constructed in 1958), 865 Belli Drive (constructed in 1958), and 885 Belli Drive (constructed in 1946). In addition, four garages associated with 701-715, 735, and 765, and 801-807 Belli Drive have been present since at least 1959.

The southern portion of the Site includes one parcel at the northeast corner of Kirman Avenue and Balzar Circle. The southern Site parcel was unimproved land in 1939. Since 1940, this parcel has been occupied by one single family residential structure, identified as 703 Balzar Circle.

The Phase I ESA identified the following suspect environmental conditions associated with the Site parcels:

- Heating sources for many of the Site buildings have included heating oil stored in underground storage tanks (USTs). Vent pipes and/or fill pipes suspected to be associated with eleven heating oil USTs were identified at the parcels during the site reconnaissance, including 825/835 Kirman Avenue (two USTs), 701-715 Belli Drive (three USTs), 735 Belli Drive, 765 Belli Drive (two USTs), 805/807 Belli Drive (one UST), 885 Belli Drive (one UST), and 703 Balzar Circle (one UST). In addition, the remaining Site residences may have historically included or may currently include heating oil USTs.

- Environmental Data Resources (EDR) identified the 805 Belli Drive property (a central Site parcel), on the State Hazardous Waste Site (SHWS) database. The SHWS listing was associated with a release of heating oil that was reported to the NDEP on November 19, 2001. The NDEP Bureau of Corrective Actions (BCA) provided additional information regarding this heating oil release. The information indicates that one 550-gallon heating oil UST and approximately 31 tons of petroleum impacted soil were removed from the 805 Belli Drive property in November 2001. Minor residual impacted soil remained following the excavation activities, but could not be removed without undermining the street and sidewalk. In a letter dated January 18, 2002, the NDEP stated that additional corrective actions were not necessary. Based on the available information, some soil contamination associated with

the heating oil release remains at the 805 Belli Drive parcel; however, NDEP has concluded that the residual impacts do not pose a current or potential threat to human health or the environment.

The Phase I ESA recommended that once access to the Site parcels is available, additional investigations, including additional site reconnaissance, a geophysical survey, and subsurface testing (soil and/or groundwater sampling), should be conducted to determine the number and locations of the heating oil USTs on the parcels, and to determine if the heating oil USTs have impacted the parcels.

In addition, based on the ages of the structures on the Site parcels, it is likely that ACMs and LBP are present; however, building surveys for ACM and LBP have not been completed.

3.13.1 Effects of the Preferred Action Alternative

Based on the data presented above, redevelopment of the Site parcels could have short-term adverse solid and hazardous materials effects. Specifically, redevelopment of these parcels could increase the exposure of persons to hazardous or toxic substances and/or increase the presence of hazardous or toxic materials in the environment during demolition and ground-disturbing activities.

Heating sources for many of the Site buildings have included heating oil stored in USTs. At least eleven heating oil USTs are suspected to currently exist at the Site parcels and other heating oil USTs may have formerly been located on the parcels. Heating oil may remain in these USTs and soil contaminated with heating oil may exist near the former and current UST locations. In addition, Site buildings that would be demolished as part of the Proposed Action may contain ACMs and LBP.

Identification and abatement of the ACM and LBP, identification and removal of the heating oil USTs, and management/remediation of any associated soil impacts would be key components of the Proposed Action. Licensed inspectors would conduct predemolition asbestos and LBP surveys of each structure to be demolished as part of the Proposed Action. ACM and peeling/damaged LBP would be removed by licensed abatement contractors prior to building demolition to prevent exposure of these materials to surrounding property occupants. VA would conduct a geophysical survey of the acquired parcels to identify heating oil USTs located on these properties. The heating oil USTs would be emptied and removed by licensed contractors. Associated petroleum-impacted soil would be removed, to the extent required. Site plans would consider residual soil and groundwater impacts at the site and would ensure onsite personnel and visitors are not at risk from the impacts. VA would inform construction contractors of the potential presence of residual petroleum impacted soil and would ensure that any excavated impacted soil is properly handled. The redevelopment activities would improve the overall environmental condition of the Site parcels, and would protect the local population from potential exposures.

The Proposed Action would also result in short-term, less-than-significant adverse impacts due to the increased presence and use of petroleum and hazardous substances during demolition and construction. An increase in demolition and construction vehicle traffic would increase the likelihood for release of vehicle operating fluids (e.g., oil, diesel, gasoline, antifreeze, etc.) and maintenance materials. As such, a less-than-significant, direct, short-term adverse impact is

possible. Implementation of standard demolition and construction BMPs would serve to ensure this impact is further minimized.

No significant adverse long-term impacts during operation of the parking lots are anticipated. No significant storage, handling, or use of petroleum or hazardous substances would occur during the operation of the parking lots.

The Proposed Action would not result in a substantial increase in the generation of solid or hazardous wastes, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation.

3.13.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA would occur and none of the USTs, potentially contaminated soils, or building materials would be disturbed. The heating oil USTs that would be removed under the Proposed Action would remain at the Site parcels. In addition, the ACM and LBP within the Site buildings would not be removed.

3.13.3 Mitigation/Management Measures

No project-specific mitigation measures are required. To reduce potentially adverse solid and hazardous materials effects, VA would implement the following management and BMPs. Implementation of these measures, including complying with all regulatory requirements, would maintain potential adverse effects at less-than-significant levels.

- Complete ACM and LBP surveys of all buildings planned for demolition by Nevada-certified inspectors.
- Remove identified ACM and damaged/peeling LBP from buildings to be demolished by Nevada-licensed abatement contractors as required under NESHAP, State and local regulations.
- Conduct a geophysical survey of the acquired Site parcels to identify heating oil USTs that may be located on these properties.
- Empty and remove any identified USTs.
- Remediate to required applicable standards any identified soil contamination.
- Properly characterize and manage residual impacted soil excavated during redevelopment.

In addition, VA would implement standard construction BMPs to ensure that construction equipment and activities do not result in releases to the environment. During operation, VA would manage operation-related solid and hazardous materials in accordance with VA's solid and hazardous materials SOPs and applicable Federal and State laws.

3.14 Transportation and Parking

Transportation

The VASNHCS campus is divided into eastern and western portions by Kirman Avenue. The western portion of the VASNHCS campus, where the medical facilities are located, is bounded to the north by East Taylor Street, to the east by Kirman Avenue, to the south by Burns Street, and to the west by Locust Street. The eastern portion of the VASNHCS campus, where primary campus parking, the campus boiler plant and campus support facilities are located, is bounded to the north by Belli Drive, residential properties along Wilkinson Avenue to the east, residential properties along Balzar Circle to the south, and Kirman Avenue to the west.

Patient and visitor access to the VASNHCS campus medical facilities is primarily provided by a two-lane circular access drive from Locust Drive (western boundary of VASNHCS) and from the western side of Kirman Avenue. Ambulance access is located in the southwestern corner of the campus with entrances from both Locust Street and Burns Street. Area roadways are detailed below in Table 8 and depicted on Figures 3-5 and Figure 11.

Table 8. Roadways Adjacent to VASNHCS

Type	Route	Direction	Daily Traffic Volumes (2013)	Road Width (feet)	Lanes	LOS
Arteria	Locust Street	One-way North	2,161	35	2*	C or Better
Residential Collector	Kirman Avenue	One-way South	3,400	35	2*	C or Better
Local	Wilknson Avenue	North-South	1,262	30	2*	C or Better
Local	Belli Drive	East-West	1,200	35	2*	C or Better
Residential Collector	East Taylor Street	East-West	2,607	35	2*	C or Better
Local	Burns Street	East-West	1,169	35	2*	C or Better
Local	Balzar Circle	East-West	Not Available	35	2*	C or Better

*-Denotes street-side parking in addition to traffic lanes.

Traffic counts conducted in October 2013

FIGURE 11
AREA ROADWAYS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED VASNHCS PARKING LOTS AND KIRMAN AVENUE MODIFICATION
RENO, NEVADA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO.
12181.02

TTL associates inc
Environmental, Geotechnical Engineering & Testing

VA retained Solaegui Engineers, LTD (Solaegui) to conduct a traffic impact analysis for the possible closure of Kirman Avenue between the eastern and western portions of the VASNHCS campus. The Solaegui VA Hospital Kirman Avenue Abandonment Traffic Analysis report, dated August 2014 (TA report), evaluated 23 intersections and 19 roadway segments adjacent to and in the vicinity of the VASNHCS campus for existing traffic conditions (2013) and the predicted future traffic conditions in 2018 and 2028 with and without the Kirman Avenue closure. The following intersections were evaluated:

- Wells Avenue/Roberts Street
- Wells Avenue/East Taylor Street
- Wells Avenue/Crampton Street
- Wells Avenue/Burns Street
- Wells Avenue/Vassar Street
- Locust Street/East Taylor Street
- Locust Street/Crampton Street
- Locust Street/Burns Street
- Kirman Avenue/East Taylor Street
- Kirman Avenue/Belli Drive
- Kirman Avenue/North Driveway
- Kirman Avenue/Middle Driveway
- Kirman Avenue/South Driveway
- Kirman Avenue/Burns Street – Balzar Circle
- Kirman Avenue/Wonder Street – Balzar Circle
- Kirman Avenue/Vassar Street
- Belli Drive/West Driveway
- Belli Drive/East Driveway
- Wilkinson Avenue/East Taylor Street
- Wilkinson Avenue/Belli Drive
- Wilkinson Avenue/Vassar Street
- Kietzke Lane/Roberts Street
- Kietzke Lane/East Taylor Street

The following roadway segments were evaluated:

- Wells Avenue north of Roberts Street
- Wells Avenue north of East Taylor Street
- Wells Avenue South of Crampton Street
- Locust Street north of East Taylor Street
- Locust Street south of Crampton Street
- Locust Street north of Wonder Street
- Kirman Avenue north of East Taylor Street
- Kirman Avenue south of East Taylor Street
- Kirman Avenue north of Burns Street
- Kirman Avenue north of Vassar Street
- Wilkinson Avenue south of East Taylor Street
- East Taylor Street west of Locust Street
- East Taylor Street west of Kirman Avenue
- East Taylor Street east of Kirman Avenue

- East Taylor Street east of Wilkinson Avenue
- Belli Drive east of Kirman Avenue
- Belli Drive west of Wilkinson Avenue
- Burns Street west of Locust Street
- Burns Street west of Kirman Avenue

The TA report used Transportation Research Board Highway Capacity Manual procedures to evaluate the existing and future Level of Service (LOS) of roads near the VASNHC campus. LOS is a qualitative measure of traffic flow and is represented by letter designations ranging from "A" to "F" with an LOS of A representing the best conditions and an LOS of F representing the worst conditions. The City of Reno has established LOS D as the minimally acceptable LOS for its roads. The TA report found that all road sections and intersections located adjacent to the VASNHCS campus currently operate at an LOS of D or better.

Four intersections within the study area were found to currently operate at an LOS below D. These include the intersection of Wells Avenue/Crampton Street (approximately 700 feet west of the campus), the intersection of Wells Avenue/Roberts Street (approximately 1,250 feet northwest of the campus), the intersection of Kietzke Lane/East Taylor Street (approximately 1,800 feet east of the campus), and the intersection of Kietzke Lane/Roberts Street (approximately 2,100 feet northeast of the campus).

Public transportation in the City of Reno is provided by the Regional Transportation Commission of Washoe County (RTC). RTC Bus Route 13 runs north along Locust Street and south along Kirman Avenue between the eastern and western portion of the campus and includes stops at the VASNHCS campus.

The City of Reno stated that City staff is not opposed to the proposed reduction of Kirman Avenue from the two lanes to one lane; however, Reno City Council approval would be required. The City of Reno would require review of all plans for the modification of Kirman Avenue at the 30 percent, 60 percent, 90 percent, and 100 percent design completion stages and VA must present preliminary and final plans to the Ward 3 Neighborhood Advisory Board (NAB) and Reno City Council. The City also noted that VA must assume maintenance responsibility for any non-standard treatments, pavements, sidewalks, fencing, pedestrian signals, or other appurtenances required for the Proposed Action that would be located in the City of Reno right-of-way (ROW).

Parking

The VASNHCS campus currently includes approximately 578 VA-owned, on-campus parking spaces provided by the parking garage on the eastern portion of the campus and seven small surface parking lots. A parking demand analysis conducted by VA indicated that the facility is currently operating under an approximately 580 parking space deficit that is projected to increase for the foreseeable future. The VASNHCS currently relies on street parking in the residential neighborhoods surrounding the campus to overcome the on-campus parking deficiency. This has resulted in overutilization of the residential street parking, traffic congestion, and pedestrian hazards.

3.14.1 Effects of the Preferred Action Alternative

Construction of the proposed parking lots on the Site parcels and construction of the Kirman Avenue modifications would have short-term, direct and indirect, transportation impacts. Construction traffic, consisting of trucks, workers' personal vehicles, and construction equipment, would increase traffic volumes in the local area, and could cause delays if this occurred during morning and evening peak periods. Construction activities on the section of Kirman Avenue that bisects the campus would restrict traffic flow during construction that would cause traffic delays, particularly for those vehicles traveling in this section of Kirman Avenue. Less-than-significant, short-term adverse impacts would be anticipated. These impacts would be reduced through the implementation of BMPs described in Section 3.14.3.

During operation, public roadways in the vicinity of the Site parcels would experience minor additional traffic as a result of the use of the new parking lots. The parking lots would not generate additional vehicle trips; patients, staff and visitors of the VASNHCS who would use the proposed parking lots currently park on the public roads surrounding the campus. However, the new parking lots could alter the pattern and flow of traffic in the surrounding area. Less-than-significant traffic impacts are anticipated as a result of the proposed new parking lots.

The purpose of the Preferred Action Alternative is to provide additional parking to help meet the current and future projected parking needs of the VASNHCS. The Preferred Action Alternative would have a significant positive impact on parking by providing up to 200 additional parking spaces to help overcome the parking deficiencies at the VASNHCS. In addition, the Preferred Action Alternative would begin to eliminate the need for street parking, which would reduce traffic congestion and pedestrian hazards in the area surrounding the VASNHCS campus.

The Solaegui TA report evaluated the potential impacts to area roads as a result of the complete closure of Kirman Avenue between the eastern and western portions of the VASNHCS campus. The TA report found that the complete closure of this section of Kirman Avenue would have impacted area traffic flow. The four intersections currently identified as having an LOS below D (Wells Avenue/Crampton Street, Wells Avenue/Roberts Street, Kietzke Lane/East Taylor Street, and Kietzke Lane/Roberts Street) would continue to have an LOS below D with little or no impact from the complete Kirman Avenue closure. However, significant traffic impacts would have resulted at the intersection of Wells Avenue/East Taylor Street (approximately 700 feet west of the campus), particularly for westbound traffic during the peak p.m. travel period.

As noted in Section 2.3.2, VA approached the City of Reno and met with local resident groups regarding the closure of the section of Kirman Avenue between the eastern and western portions of the campus. The resident groups expressed concern that the complete closure of this section of road would worsen already strained traffic conditions in the area. As a result of this input, VA decided that modifications of Kirman Avenue to moderate and control traffic flow adjacent to the campus, yet maintain the flow of through traffic on one lane, would improve pedestrian safety and is preferable. This revised plan, which is included as part of the Preferred Action Alternative, is expected to have much less impact on the local roads than the complete closure of this section of Kirman Avenue. The City of Reno indicated that it supported the roadway modification alternative and requested that a revised traffic impact analysis be conducted that assessed the proposed modifications. The City also noted that road modifications would require City of Reno and Reno City Council approval. The revised traffic impact analysis would identify potential significant adverse effects of the roadway modifications

and the proposed parking lots, while taking in account other planned VASNHCS projects, and would provide recommendations to mitigate these effects. These modifications would be incorporated into the design documents, which would be submitted to the City of Reno for review and approval.

3.14.2 Effects of the No Action Alternative

Under the No Action Alternative, no transportation or parking impacts associated with VA's Proposed Action would occur. The VASNHCS would continue to operate at a parking deficiency, resulting in the overutilization of street parking in the surrounding residential neighborhood. In addition, the section of Kirman Avenue adjacent to the campus would remain dangerous to cross for VASNHCS patients, staff and visitors.

The No Action Alternative would not enable VA to provide safely accessible, adequate parking for VASNHCS patients, staff and visitors and would result in a significant adverse, long-term direct impact to US Veterans.

3.14.3 Mitigation/Management Measures

The proposed modifications to Kirman Avenue could result in significant traffic impacts. To identify and mitigate these potential impacts, VA would:

- Conduct a revised traffic impact analysis to evaluate potential traffic impacts associated with the proposed Kirman Avenue modifications and proposed parking lots.

- Work with the City of Reno to design and implement roadway improvements to mitigate any identified potentially significant traffic impacts. Submit Kirman Avenue modification plans at the 30 percent, 60 percent, 90 percent, and 100 percent design completion stages to The City of Reno for approval. Present preliminary and final plans to the Ward 3 Neighborhood Advisory Board and Reno City Council.

In addition, implementing BMPs would minimize the potential impacts on local roadways. As part of the Preferred Action Alternative, transportation impacts would be maintained at acceptable levels through implementation of the following BMPs:

- VA would work with the City of Reno, as applicable and necessary, to identify and implement roadway improvements, such as signalization and turn lanes, to maintain traffic within the region of influence of the parking lots at an acceptable level of service.

- Ensure debris and/or soil is not deposited on local roadways during the construction period.

- Ensure construction activities do not adversely affect traffic flow on local roadways; construction traffic would be timed to avoid peak travel hours.

3.15 Utilities

Basic utilities in the City of Reno (i.e., water, sewer, natural gas, and electric) are provided by the various utility providers. As part of the preparation of this EA, local utility providers were researched to determine the availability of required utilities in the vicinity of the Site parcels. The following identifies the utility providers to the Site parcels:

Truckee Meadows Water Authority (TMWA) supplies potable water to the Site parcels. Based on the minimal water service needs of the Proposed Action, the existing potable water service is likely to be adequate for the Proposed Action. VA would be required to submit design plans to the TMWA to connect to the potable water service.

Reno Public Works Department (RPWD) is responsible for stormwater management at the Site parcels through the NPDES permitting process. VA would be required to submit a SWMP to the RPWD.

RPWD supplies sanitary sewer service to the Site parcels. No sanitary sewer needs are anticipated for the Proposed Action. VA would be required to submit design plans to the RPWD to connect to the sanitary sewer service.

NV Energy supplies electrical service to the Site parcels. Based on the minimal electrical service needs of the Proposed Action, the existing electrical service in the vicinity of the Site parcels is likely to be adequate for the Proposed Action. VA would be required to submit design plans to NV Energy to connect to the electrical service.

NV Energy supplies the natural gas to the vicinity of the Site parcels. No natural gas service needs are anticipated for the Proposed Action. VA would be required to submit design plans to NV Energy to connect to the natural gas service.

AT&T provides telecommunication services to the vicinity of the Site parcels. Based on the minimal telecommunication needs of the Proposed Action, the telecommunication service in the vicinity of the Site parcels is likely to be adequate for the Proposed Action. VA would be required to submit design plans to AT&T to connect to the telecommunication service.

3.15.1 Effects of the Preferred Action Alternative

The proposed parking lots would result in a minimal utility use including, electricity and possibly potable water and telecommunication services. Utility use would likely be less than currently used at the Site parcels, which are developed with several residential structures. All major utility services are available immediately next to or in close proximity to the Site parcels. Although a municipal stormwater system exists in the area of the Site parcels, on-site stormwater retention may be required. Each utility provider would require a review of the design plans to determine connection/extension requirements to service the proposed parking lots. No significant impacts to local utilities are anticipated.

3.15.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA would occur. Local utilities would likely continue to be used as currently conducted by the existing residences.

3.15.3 Mitigation/Management Measures

No project-specific mitigation measures are required.

Utility impacts would be maintained at acceptable levels through the implementation of the following BMPs. VA would:

- Obtain permits from the utility providers for capping/disconnecting the existing utility services prior to building demolition.
- Submit design plans to each utility provider to determine the specific connection requirements and would implement the necessary requirements.
- Comply with the NPDES requirements for stormwater management, as necessary.

3.16 Environmental Justice

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued to focus attention of Federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed. In order to provide a thorough environmental justice evaluation, this socioeconomics' presentation gives particular attention to the distribution of race and poverty status in areas potentially affected by implementation of the Proposed Action. For purposes of this analysis, minority and low-income populations are defined as:

- Minority Populations: Persons of Hispanic origin of any race, African Americans, American Indians, Eskimos, Aleuts, Asians, or Pacific Islanders.
- Low-Income Populations: Persons living below the poverty level, based on a total annual income of $24,250 for a family of four persons as reported in January 2015.

The Site parcels are located in a residential area with a disproportionately large low-income population relative to the remainder of the City of Reno, Washoe County, and the State of Nevada. According to the USEPA-developed EJSCREEN (an environmental justice mapping and screening internet application), the area within a 0.25-mile radius of the Site parcels includes a higher concentration of low-income populations (66 percent) than the State of Nevada (34 percent). The area within a 0.5-mile radius of the Site parcels also includes a higher concentration of low-income populations (62 percent) than the State of Nevada. EJSCREEN did not identify a disproportionately large minority population in the Site parcel area.

3.16.1 Effects of the Preferred Action Alternative

As described in Section 2.3, VA undertook an alternatives screening process to narrow the number of reasonable alternatives considered for the Proposed Action. Through this process, it became apparent that only the acquisition of adjacent parcels for additional surface-level parking was reasonable. VA has initiated substantial and documented public engagement to ensure effective and meaningful community participation in the NEPA process.

Under the Proposed Action, 11 parcels of residential land are proposed for acquisition to accommodate the Proposed Action. VA, as part of its "good neighbor" policy and being sensitive to environmental justice considerations, would seek to acquire these parcels from willing landowners through amicable negotiations.

As detailed in Section 3.11.6, VA would purchase the Site parcels at their fair market value, as determined by a third party licensed, independent appraiser. In addition, VA would offer relocation assistance for residents and residential tenants displaced as a result of the implementation of the Proposed Action. As a result of VA's voluntary acquisition process and relocation assistance, potential environmental justice impacts associated with land acquisition would be less-than-significant.

During construction, effects on adjacent residential land uses, such as through noise and dust, would be limited and controlled as discussed in Sections 3.3 and 3.8, thereby minimizing adverse effects to low-income populations in the ROI.

In addition, the Proposed Action construction activities are anticipated to result in short-term, direct, positive socioeconomic impacts to local employment and personal income in the ROI as described in Section 3.11.6. Given the ROI is a low-income community, such positive effects would be anticipated to extend to local minority and low-income citizens, a positive environmental justice effect.

No local groups are known to principally rely on fish or wildlife for subsistence in the vicinity of the VASNHCS campus. Consequently, no adverse impacts to such disadvantaged segments of the population are anticipated.

3.16.2 Effects of the No Action Alternative

Under the No Action Alternative, the proposed VA activities would not occur and there would be no environmental justice effects.

3.16.3 Mitigation/Management Measures

No project-specific mitigation or management measures are required. VA would implement the following management measures to reduce environmental justice effects associated with the Proposed Action:

- VA would offer displaced residents and residential tenants relocation assistance as described in Section 3.11.8.

3.17 Cumulative Impacts

As defined by CEQ Regulations in 40 CFR Part 1508.7, cumulative impacts are those which "result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions." Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions taken during the duration of the Proposed Action in the same geographic area. Because of extensive influences of multiple forces, cumulative effects are the most difficult to analyze.

NEPA requires the analysis of cumulative environmental effects of a Proposed Action, or set of actions, on resources that may often be manifested only at the cumulative level, such as traffic congestion, air quality, noise, biological resources, cultural resources, socioeconomic conditions, utility system capacities, and others.

The ROI for the Proposed Action is a fully developed urban area. The area located around VASNHCS campus is currently occupied by residential neighborhoods with little space remaining for in-fill development.

Starting in 2010, VA began a multi-year effort to reconfigure the VASNHCS campus to provide additional and more efficient medical care for Reno area Veterans. Several construction projects are planned for the reconfiguration, including:

Western Portion of the VASNHCS Campus

- Demolition of 50,000 SF of Building 1
- Renovation of 97,000 SF of Building 1 to provide better delivery of service
- Construction of a 160,000 SF, five-story addition to the east of Building 1 to provide expanded outpatient services
- Construction of a small new backup generator building
- Several smaller, primarily interior renovation projects

Eastern Portion of the VASNHCS Campus

- Relocation or demolition of small, underutilized support buildings located at the southeastern portion of the campus
- Construction of a three-level parking garage in the southeastern portion of the campus (approximately 320 parking spaces)

Based on proximity and general timing, the Preferred Action Alternative could have cumulative effects in conjunction with the planned VASNHCS reconfiguration construction projects, although it is anticipated that most of these projects would not be constructed at the same time.

The Preferred Action Alternative would result in the impacts identified throughout Section 3. These primarily include potential adverse impacts to aesthetics, air quality, cultural resources, soils and geology, hydrology and water quality, noise, land use, socioeconomics, solid and hazardous materials, transportation and parking, utilities, and environmental justice. With the exception of potential cultural resources and transportation impacts, all of these impacts are less-than-significant and would be further reduced through careful coordination and implementation of the general BMPs and management measures, and compliance with regulatory requirements as identified throughout Section 3. No adverse effects to wildlife and habitat; wetlands, floodplains, and coastal zones; or community services are anticipated as a result of the Proposed Action.

No cumulative adverse effects to natural resources, such as wetlands, biological resources, or protected species would occur. The ROI includes a fully developed urban area with limited natural resources.

While VASNHCS campus is located in a low-income area, no significant adverse cumulative effects to local socioeconomics or environmental justice would occur. Under the Proposed Action, all properties would be acquired from willing property owners for a fair market value and VA would provide relocation benefits for those residents and residential tenants displaced by the land acquisition. Over the long-term, the Proposed Action in combination with the other planned projects at the VASNHCS campus would contribute to cumulative positive socioeconomic and environmental justice effects to the ROI through increased jobs and incidental spending.

The Proposed Action would not contribute to adverse cumulative aesthetics, air quality, noise, geology and soils, hydrology and water quality, land use, community services, or utilities effects within the ROI. Through implementation of the identified management and regulatory compliance measures, these contributory effects would be minimal and properly managed, working in close cooperation with pertinent regulatory agencies. Consequently, the Proposed Action would not contribute to a cumulative significant adverse effect.

The VASNHCS campus and surrounding area are located within three NRHP-eligible historic districts. The Preferred Action Alternative could result in significant adverse effects on cultural resources. Residential structures on six of the parcels proposed for acquisition contribute to the Belli Addition Historic District. The demolition of the homes on these parcels would result in an adverse effect to the historic district. However, in consultation with SHPO, VA would develop a plan to mitigate cultural resource effects associated with the Preferred Action Alternative. The mitigation measures would be formalized in a MOA between VA and SHPO and other interested parties. The other planned construction projects would occur on the VASNHCS campus and would not entail the demolition of historic structures; however, there could be indirect cultural resources effects associated with these projects. VA will also consult with the SHPO on these projects and develop mitigation plans and enter into MOAs, as applicable and necessary, to mitigate these cultural resources effects. Through close consultation with SHPO regarding the Proposed Action and the other planned VASNHCS projects, and compliance with the terms of the MOAs that are developed, VA would ensure that no significant adverse cumulative cultural resources impacts occur.

The Preferred Action Alternative could result in significant adverse effects on transportation in the area of the VASNHCS campus as a result of the reduction of Kirman Avenue from two southbound lanes to one southbound lane. Other planned VASNHCS projects, in particular the construction of the expanded medical facilities and the proposed new parking structure, would impact transportation in the area as a result of increased patient visits (expanded facilities) and shifted traffic patterns (new parking garage). As part of the Proposed Action, VA would conduct a traffic impact analysis to evaluate the potential effects of the proposed Kirman Avenue modifications, the proposed parking lots, and other planned VASNHCS projects and would work with the City of Reno to design and implement improvements that would mitigate any identified significant adverse effects to acceptable, less-than-significant levels. Additional traffic impact analyses will be conducted, if applicable, during the design of these other VASNHCS projects that consider the cumulative effects of each of the planned and implemented projects. Through close coordination with the City of Reno, VA would implement improvements, as necessary, to mitigate potential cumulative unacceptable traffic impacts.

The Preferred Action Alternative would create up to 200 additional VA-owned parking spaces on the acquired land. The proposed parking structure on the southeastern portion of the VASNHCS campus would provide approximately 320 additional parking spaces. These projects would have a significant positive cumulative effect through the creation of up to 520 parking

spaces, overcoming most of the current parking shortage (580 parking spaces). Together, these actions would nearly eliminate the VASNHCS need for street parking in the residential neighborhood surrounding the campus, which would reduce traffic congestion and pedestrian hazards.

Overall, no significant adverse cumulative impacts to the environment, induced by changes by the Preferred Action Alternative, are anticipated within the ROI. Close and ongoing coordination between VA and the City of Reno and SHPO, and other community agencies and representatives would serve to manage and control cumulative effects within the ROI, including managing regional transportation increases with adequate infrastructure.

Implementation of local and State land use, resource management, and other plans, coupled with ongoing compliance with Federal, State, and local regulations and requirements, as applicable, would serve to control the extent of environmental impacts, and proper planning would ensure future socioeconomic conditions maintain, if not improve, the local standard of living. Implementation of these plans and regulations should minimize or eliminate any potential cumulative degradation of the natural, cultural, or human environment within the ROI.

Under the No Action Alternative, cumulative impacts due to the Proposed Action would not occur. The No Action Alternative would also contribute to a significant adverse cumulative socioeconomic impact in the region. Specifically, VA's ability to provide modern, quality medical care to our nation's Veterans over the long-term would be compromised.

3.18 Potential for Generating Substantial Public Controversy

As discussed in Section 4.0, VA has solicited input from various Federal, State, and local government agencies regarding the Proposed Action. Several of these agencies have provided input; none of the input has identified opposition or controversy related to the Preferred Action Alternative. As previously noted, VA initially considered the complete closure of the section of Kirman Avenue that bisects the VASNHCS campus to address pedestrian safety concerns. This alternative was met with opposition from the local residents and the City of Reno. As a result, VA eliminated this alternative from further consideration and held meetings with the public to consider other options for improving the safety of pedestrians crossing Kirman Avenue. Through this process, VA selected the reduction of Kirman Avenue to one lane as the Preferred Action Alternative.

VA published and distributed the Draft EA for a 30-day public comment period and held a public meeting regarding the Draft EA and Proposed Action on December 17, 2015. Several commenters indicated that they disagreed with the Preferred Action Alternative and offered other alternatives to address the on-campus parking deficiencies and pedestrian safety hazards. Comments provided during and after the public meeting indicate that there is some controversy regarding the Proposed Action. Public comments and/or concerns are discussed in Section 4.

SECTION 4: PUBLIC INVOLVEMENT

4.1 Public and Agency Involvement

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 38 CFR Part 26, VA's policy for implementing the NEPA. Additional guidance is provided in VA's NEPA Interim Guidance for Projects (VA 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as minority, low-income, and disadvantaged persons, are urged to participate. A record of agency coordination and public involvement associated with this EA is provided in Appendix A and Appendix D.

4.1.1 Public Review

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in the *Reno Gazette-Journal*, on November 21- 23, 2015. The Draft EA was also made available for public review at the VASNHCS and the Washoe County Library. In addition, VA held a public meeting at VASNHCS on December 17, 2015 to briefly summarize the Draft EA and receive public comment. Twenty-one people, mostly residents or property owners of the area near the VASNHCS, signed in as attendees at the public meeting. Twelve people provided verbal comments during the meeting. Three people provided written comments via email or on the comment sheet after the meeting. Several of the commenters provided similar comments and many provided multiple comments. Comments included the suggestion of other alternatives to address the parking deficit and pedestrian safety issues at the VASNHCS campus, concern about potential traffic impacts associated with the Preferred Action Alternative, concern that VA would obtain parcels through eminent domain and would close Kirman Avenue entirely (neither is planned), and concern about the economic and aesthetic impacts of the Preferred Action Alternative on the surrounding residential properties.

The comments that are relevant to the Draft EA and VA's responses are summarized in Appendix D. Where applicable, the Final EA was modified to reflect these comments.

4.1.2 Agency Coordination

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a Federal mandated process for informing and coordinating with other governmental agencies regarding Federal Proposed Actions. CEQ Regulations require intergovernmental notifications prior to making any detailed statement of environmental impacts. Through the IICEP process, VA notifies relevant Federal, State, and local agencies and allows them sufficient time to make known their environmental concerns specific to a Proposed Action. Comments and concerns submitted by these agencies during the IICEP process are subsequently incorporated into the analysis of potential environmental impacts conducted as part of the EA. This coordination fulfills requirements under EO 12372 (superseded by EO 12416, and subsequently

supplemented by EO 13132), which requires Federal agencies to cooperate with and consider State and local views in implementing a Federal proposal. It also constitutes the IICEP process for this EA.

Agencies consulted for this EA include: US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Army Corps of Engineers (USACE); Nevada Division of Environmental Protection (NDEP); Nevada Department of Conservation and Natural Resources (NCDNR); Nevada State Historic Preservation Office (SHPO); Nevada Department of Transportation (NDOT), United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), Reno Economic Community Development Department (RECDD), Reno Economic Development and Redevelopment Department (REDRD), Reno Department of Public Works (RDPW), and Regional Transportation Commission of Washoe County (RTC).

Responses were received from the following agencies: USFWS, NDEP, NDCNR, SHPO and RTC. Input provided by these agencies is detailed and addressed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix A.

4.1.3 Native American Consultation

VA consulted with several federally recognized Native American tribes as part of this NEPA process, in accordance with 36 CFR 800.2 and EO 13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000 (see Section 1.5.3). These tribes, identified as having possible ancestral ties to the area by the SHPO or the Native American Consultation Database (NACD), were invited by VA to participate in the EA process as Sovereign Nations per EO 13175. In addition, SHPO identified two Nevada organizations, Preserve Nevada and Nevada Architectural History Alliance, and requested that VA include these organizations in their consultation. These tribes and organizations were sent coordination and consultation letters, via certified mail. A list of the tribes that were consulted is provided in Section 10. As of the date of this EA, no responses have been received from the tribes (VA 2015).

SECTION 5: MANAGEMENT AND MITIGATION MEASURES

This section summarizes the management and mitigation measures identified in Section 3 that are proposed to minimize and maintain adverse effects at acceptable, less-than-significant levels.

Per established protocols, procedures, and requirements, the VA and its construction contractor would implement BMPs and would satisfy all applicable regulatory requirements in association with land acquisition, and the design, construction, and operation of the proposed parking lots. These "management measures" are described in this EA, and are included as components of the Preferred Action Alternative. "Management measures" are defined as routine BMPs and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across the State of Nevada. In general, implementation of such management measures, as identified throughout Section 3, would maintain impacts at acceptable levels for all resource areas analyzed. These are different from "mitigation measures," which are defined as project-specific requirements, not routinely implemented as part of construction projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

5.1 Management Measures

With implementation of routine "management measures," the Preferred Action Alternative would not result in significant adverse impacts to, and would reduce identified potential adverse effects to, the current environmental setting associated with the following technical resource areas:

Aesthetics. Comply with the RLDC, to the extent practicable, install focused lighting with baffles, install landscaping and pedestrian-friendly improvements in the design of Kirman Avenue modifications, as detailed in Section 3.2.

Air Quality. Complete predemolition asbestos and LBP surveys, remove ACM and peeling/damaged LBP from the site buildings prior to demolition, use dust suppressants during demolition, develop and implement a CEMP to reduce impacts from fugitive dust and diesel particulate matter, control fugitive dust emissions during construction, obtain required air quality emissions construction and operation permits (if necessary) from Washoe County AQMD, and comply with the Washoe County AQMD regulations, as described in Section 3.3.

Geology and Soils. Control soil erosion and sedimentation impacts during construction by complying with NPDES permit requirements. Refer to Section 3.5.

Hydrology and Water Quality. Implement BMPs to control construction and operational-related impacts of soil erosion and sedimentation. Include sufficient on-site stormwater management during project design. Refer to Section 3.6.

Wildlife and Habitat. Replant and landscape with native species, and comply with the City of Reno RLDC to the extent practicable, as described in Section 3.7.

Noise. Comply with the City of Reno Noise Ordinance. Minimize noise effects during construction activities, as described in Section 3.8.

Socioeconomics. Develop and implement a Relocation Plan for residents, residential tenants, and/or landlords displaced by the Proposed Action, as detailed in Section 3.11.

Solid and Hazardous Materials. Complete predemolition asbestos and LBP surveys, remove ACM and damaged/peeling LBP from the site buildings prior to demolition; further investigate the Site parcels to evaluate for potential heating oil USTs and contamination; empty and remove any identified USTs; remediate any identified impacted soil to the required applicable standards; properly characterize and manage residual impacted soils excavated during redevelopment; and implement construction and operational BMPs to minimize effects and to comply with applicable regulations. Refer to Section 3.13.

Utilities. Submit Proposed Action design plans to obtain necessary approvals from utility providers, as described in Section 3.15.

Environmental Justice. Provide relocation assistance for residents and residential tenants displaced by the Proposed Action, as detailed in Section 3.16.

No management measures are identified by this EA's analysis for the Action Alternatives for the following technical resource areas: ***Land Use; Wetlands, Floodplains, and Coastal Zone Management; and Community Services***.

5.2 Mitigation Measures

Cultural Resources

The Preferred Action Alternative could cause adverse effects to historic resources. VA has actively engaged with the SHPO and through this consultation, has developed preliminary plans to mitigate the adverse effects to less-than-significant levels. These preliminary plans include:

- Placing an interactive display within the hospital. This would serve as a demonstration for the local community of the historic value of the neighborhood architecture and the historic value of the VASNHC to the development of the City of Reno. The display would demonstrate the historic significance of the neighborhoods surrounding the VASNHCS, with special highlights regarding the architectural styles that contribute to their historic significance.

- An addition of a link from the VASNHCS website to a website dedicated to the history of the surrounding neighborhoods that includes both written and photographic history of the surrounding area.

- Inclusion of historic photographs of the surrounding neighborhoods within public spaces in the hospital honoring the heritage of the area.

If the Preferred Action Alternative is implemented and Site parcels containing structures contributing to the Belli Addition Historic District are acquired, VA would:

- Enter into a formal MOA with the SHPO and other interested parties that defines an appropriate plan to mitigate the adverse cultural resources effects.

- Implement the mitigation plan defined in the MOA.

In addition, implementing BMPs to reduce impacts during construction would further minimize potential impacts to local cultural resources. All contractors involved in site preparation and ground disturbing construction would be advised that all work must stop immediately in the event that archaeological features, artifacts, or remains are discovered during project construction. The construction contractor would immediately cease work until VA, a qualified archaeologist and the SHPO are contacted to properly identify and appropriately treat discovered items in accordance with the MOA and applicable State and Federal law(s).

Transportation

The proposed modifications to Kirman Avenue could result in significant traffic impacts. To identify and mitigate these potential impacts, VA would:

- Conduct a revised traffic impact analysis to evaluate potential traffic impacts associated with the proposed Kirman Avenue modifications and proposed parking lots.

- Work with the City of Reno to design and implement roadway improvements to mitigate any identified potentially significant traffic impacts. Submit Kirman Avenue modification plans at the 30 percent, 60 percent, 90 percent, and 100 percent design completion stages to The City of Reno for approval. Present preliminary and final plans to the Ward 3 Neighborhood Advisory Board and Reno City Council.

In addition, implementing BMPs would minimize the potential impacts on local roadways. As part of the Preferred Action Alternative, transportation impacts would be maintained at acceptable levels through implementation of the following BMPs:

- VA would work with the City of Reno, as applicable and necessary, to identify and implement roadway improvements, such as signalization and turn lanes, to maintain traffic within the region of influence of the parking lots at an acceptable level of service.

- Ensure debris and/or soil is not deposited on local roadways during the construction period.

- Ensure construction activities do not adversely affect traffic flow on local roadways; construction traffic would be timed to avoid peak travel hours.

SECTION 6: CONCLUSIONS

This EA evaluates the Proposed Action of VA to acquire land adjoining to the VASNHCS campus located at 975 Kirman Avenue in Reno, Washoe County, Nevada for the construction and operation of surface parking lots for the facility. The Proposed Action also includes the modification of Kirman Avenue between the eastern and western portions of the VASNHCS campus to provide improved safety for patients and staff crossing from the parking facilities east of Kirman Avenue to the medical center buildings west of Kirman Avenue. This EA discusses two alternatives: (1) *Preferred Action Alternative* - the acquisition of up to 11 parcels of residential land (totaling approximately two acres) adjoining to the north and east of the VASNHCS campus across East Taylor Street, Kirman Avenue and Belli Drive for the construction and operation of surface-level parking lots (would provide up to 200 additional parking spaces) and the reduction of Kirman Avenue to one lane between the eastern and western portions of the VASNHCS campus; and (2) the *No Action Alternative*. The EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; and environmental justice. The EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementing the Preferred Action Alternative, provided general BMPs, management measures, and mitigation measures specified in this EA are implemented. Therefore, this EA concludes that a mitigated FONSI is appropriate, and that an EIS is not required.

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SECTION 8: REFERENCES CITED

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EO 13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000.

EO 13514, Federal Leadership in Environmental, Energy, and Economic Performance, October 2009.

Energy Independence Security Act (EISA) Section 438, 2007.

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Nevada Division of Environmental Protection, Bureau of Safe Drinking Water, 2015.

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Reno Regional Transportation Commission, 2015.

Traffic Impact Analysis for VA Reno Building 1 Seismic Upgrade and Clinical Expansion, KD Anderson and Associates, Inc., April 28, 2014.

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USDA Natural Resources Conservation Service – Reno Service Center, 2015.

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US Fish and Wildlife Service (USFWS), Nevada Fish and Wildlife Office, 2015.

US Environmental Protection Agency (USEPA), Region 9 2015.

US Census Bureau 1990, 2000, 2005, 2006, 2008, 2009 and 2010.

US Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey 2015.

US Environmental Protection Agency (USEPA) National Ambient Air Quality Standards (NAAQS), 2008.

US Geological Survey, 2015.

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VA Hospital Kirman Avenue Abandonment Traffic Analysis, Solaegui Engineers, Inc., August 2014.

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Superfund Site Information Systems, US Environmental Protection Agency, website: http://cfpub.epa.gov/supercpad/cursities.htm

USEPA Environmental & Compliance History Online (ECHO) e-database: http://www.epa-echo.gov/echo/

US Bureau of Census (2010 US Census Data): http://www.census.gov/

USDA NRCS online web soil survey: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

Various internet mapping tools to locate properties, www.mapquest.com, www.maps.google.com, www.google.earth.com, etc.

SECTION 9: LIST OF ACRONYMS AND ABBREVIATIONS

ACA	Air Compliance Assurance
ACHP	Advisory Council on Historic Preservation
AIRFA	American Indian Religious Freedom Act
AIS	Archeological Investigation Survey
amsl	above mean sea level
ARPA	Archaeological Resources Protection Act
ATC	Authorize to Construct
BEA	Bureau of Economic Analysis
bgs	Below Ground Surface
BMP	Best Management Practice
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CMP	Coastal Management Program
CO	Carbon Monoxide
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EDR	Environmental Data Resources, Inc.
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
HAP	Hazardous Air Pollutant
HCl	Hydrochloric Acid
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NCDNR	Nevada Department of Conservation and Natural Resources
NDEP	Nevada Division of Environmental Protection
NDOT	Nevada Department of Transportation
NEPA	National Environmental Policy Act of 1969
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NO_X	Nitrogen Oxides
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O_3	Ozone
OSHA	Occupational Safety and Health Administration
Pb	Lead
PM	Particulate matter

PM_{10}	Particulate matter less than or equal to 10 micrometers in aerodynamic size
$PM_{2.5}$	Particulate matter less than or equal to 2.5 micrometers in aerodynamic size
PTE	Potential to Emit
RCRA	Resource Conservation and Recovery Act
RDPW	Reno Department of Public Works
RECDD	Reno Economic Community Development Department
REDRD	Reno Economic Development and Redevelopment Department
ROI	Region of Influence
RRTC	Reno Regional Transportation Commission
SIP	State Implementation Plan
SHPO	NCDNR, State Historic Preservation Office (SHPO)
SO_2	Sulfur dioxide
SWCD	Soil and Water Conservation District
TPY	Tons per year
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans Affairs

SECTION 10: AGENCIES AND INDIVIDUALS CONSULTED

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SECTION 11: LIST OF ENVIRONMENTAL PERMITS REQUIRED

11.1 Regulatory Framework

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and 38 CFR Part 26. In addition, the EA has been prepared as prescribed in VA's *NEPA Interim Guidance for Projects* (VA 2010). Federal, State, and local laws and regulations specifically applicable to this Proposed Action are specified, where appropriate, within this EA, and include:

- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Endangered Species Act (ESA) of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Native American Graves Protection and Repatriation Act, as amended (NAGPRA) (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- Federal Clean Air Act (CAA) of 1990 (42 USC 7401 *et seq*., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 *et seq*.); Sections 401 and 404.
- Executive Order 11988, *Floodplain Management* (24 May 1977).
- Executive Order 11990, *Protection of Wetlands* (24 May 1977).
- Executive Order 12898, *Environmental Justice* (11 February 1994).
- Executive Order 13514/Energy Independence Security Act (EISA) Section 438.
- Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* (24 January 2007).
- Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance* (5 October 2009).
- Article VI (Environmental Performance Standards and Article X (Landscape and Tree Preservation) of Chapter 51A, Part II of the Reno Development Code.
- Nevada Administrative Code (TAC) Title 30 (Environmental Quality), Part 1 (Nevada Commission on Environmental Quality), Chapters 101 through 118 (Air Quality Rules).

- Chapter 5A (Air Pollution) of the Reno City Code.
- City of Reno Trinity Watershed Management/Reno Stormwater Management Program Nevada Pollution Discharge Elimination System (TPDES).
- Article VI (Environmental Performance Standards and Article X (Landscape and Tree Preservation) of Chapter 51A, Part II of the Reno Development Code.
- Chapter 30 (Noise Ordinance) of the City of Reno Land Development Code).
- City of Reno, Development Code, Article IV (Zoning Regulations).

11.2 Environmental Permits Required

In addition to the regulatory framework of the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, 38 CFR Part 26, and VA's *NEPA Interim Guidance for Projects,* the following Federal, State, and/or local environmental permits are required as part of this Proposed Action, and include:

- City of Reno Trinity Watershed Management/Reno Stormwater Management Program Nevada Pollution Discharge Elimination System (TPDES) permit.
- Nevada Department of Transportation Right-of-Way access permit.
- City of Reno Landscaping Plan
- City of Reno Tree Protection Plan.

SECTION 12: GLOSSARY

100-Year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a one percent chance of its occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient - The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards - Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer - An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Asbestos - Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area - Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Bedrock - The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) - Methods, measures, or practices to prevent or reduce the contributions of pollutants to U.S. waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial land use – Land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals, clinics, etc.), and military buildings and installations.

Compaction - The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Contaminants - Any physical, chemical, biological, or radiological substances that have an adverse effect on air, water, or soil.

Council on Environmental Quality (CEQ) - An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends, and to appraise programs and activities of the Federal Government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants - The CAA of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), nitrogen dioxide (NO_2), and particulate matter.

Cultural Resources - The physical evidence of our Nation's heritage. Included are: archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Decibel (dB) - A unit of measurement of sound pressure level.

Direct Impact - A direct impact is caused by a Proposed Action and occurs at the same time and place.

Emission - A release of a pollutant.

Endangered Species - Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) - An EA is a publication that provides sufficient evidence and analyses to show whether a proposed system will adversely affect the environment or be environmentally controversial.

Erosion - The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Farmland - Cropland, pastures, meadows, and planted woodland.

Fauna - Animal life, especially the animal characteristics of a region, period, or special environment.

Flora - Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain - The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FONSI - Finding of No Significant Impact, a NEPA document.

Fugitive Dust - Particles light enough to be suspended in air, but not captured by a filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology - Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater - Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance - Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under TSCA.

Any hazardous air pollutant listed under Section 112 of CAA.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR 302.4.

Hazardous Waste - A solid waste which, when improperly treated, stored, transported, or disposed of, poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR 261.3 or applicable foreign law, rule, or regulation.

Hazardous Waste Storage - As defined in 40 CFR 260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".

Hydric Soil - A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Indirect Impact - An indirect impact is caused by a Proposed Action that occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced

changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Isolated Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the Waters of the US.

Jurisdictional Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the US. These wetlands are regulated by the USACE.

Listed Species - Any plant or animal designated as a State or Federal threatened, endangered, special concern, or candidate species.

Mitigation - Measures taken to reduce adverse impacts on the environment.

Mobile Sources - Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring - A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter, and sulfur dioxide (SO_2).

National Environmental Policy Act (NEPA) - U.S. statute that requires all Federal agencies to consider the potential effects of Proposed Actions on the human and natural environment.

Non-attainment Area - An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more National or State ambient air quality standards.

Parcel - A plot of land, usually a division of a larger area.

Particulates or Particulate Matter - Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic Region - A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant - A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water - Water which is suitable for drinking.

Prime Farmland - A special category of highly productive cropland that is recognized and described by the US Department of Agriculture's Soil Conservation Service and receives special protection under the Surface Mining Law.

Remediation - A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas - Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

River Basin - The land area drained by a river and its tributaries.

Sensitive Receptors - Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Significant Impact - According to 40 CFR 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a

whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Small quantity generator - A generator who generates greater than 220 pounds but less than 2,200 pounds of hazardous waste in a calendar month and who does not accumulate more than 13,200 pounds of hazardous waste at any one time (if either threshold is exceeded, the generator becomes a large quantity generator). A small quantity generator may accumulate hazardous waste up to 180 days from the accumulation start date.

Soil - The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste - Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

Threatened species - Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography - The relief features or surface configuration of an area.

Toxic Substance - A harmful substance which includes elements, compounds, mixtures, and materials of complex composition.

Waters of the United States - Include the following: (1) All waters which are currently being used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (2) All interstate waters including interstate wetlands. (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds; the use, degradation or destruction of which could affect interstate or foreign commerce.

Watershed - The region draining into a particular stream, river, or entire river system.

Wetlands - Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes, and estuaries.

Wildlife Habitat - Set of living communities in which a wildlife population lives.

APPENDIX A

Agency Correspondence

APPENDIX B

Photograph Logs

APPENDIX C

Other Relevant Environmental Data

APPENDIX D

Public Notices and Comments